

Corporate General Disclosure Statement

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CORPORATE GENERAL PRIVACY NOTICE REGARDING THE PROCESSING OF PERSONAL DATA

Alsero Tourism Trade Limited Company has prepared this notice to inform our Employees, Job Applicants, Visitors, Online Visitors, Customers, Potential Customers, Supplier Employees, Supplier Representatives, and Business Partners about the processing, storage and transfer of your personal data within the scope of our activities arising from Law No. 6698 on the Protection of Personal Data (“PDPL”) and the related legislation and regulatory provisions.

What Categories of Personal Data Do We Process and For What Purposes?

Your personal data may be processed by **Alsero Tourism Trade Limited Company** in accordance with the principles envisaged in Article 4.2 of the PDPL, namely;

- processing lawfully and in good faith,
- being accurate and, where necessary, up-to-date,
- being processed for specified, explicit and legitimate purposes,
- being relevant, limited and proportionate to the purposes for which they are processed,

being retained for the period stipulated by the applicable legislation or for as long as necessary for the purposes for which they are processed,

in accordance with the foregoing principles, within the scope of our established and ongoing business relationships with our business partners (a person may fall into more than one category), your personal data may be processed for the purposes set out below.

For our Employees;

Categories of Data	Examples of Data Types Processed in This Category
Identity Data	Your name, surname, Turkish ID number (T.C. No), date of birth, place of birth, gender, marital status, copy of identity card, your signature, social security number, passport information
Contact Data	Your telephone number, residential address, e-mail address, contact details of the person to be contacted in emergencies,
Personnel Data	Your CV/resume, military discharge certificate, financial and salary details, bank account information, social security enrollment/retirement information

Legal Proceedings Data	Your information in correspondence with judicial authorities, information contained in court files
Professional Experience Data	Your educational background, diplomas, certificates, trainings received, skills, courses attended, copy of your driver's license, SRC Certificate
Visual and Audio Recordings	Visual and audio recordings you have shared with our Company
Health Data	Detailed health or medical information
Personal Data Relating to Family Members	Information and documents relating to your family members, such as education, death, birth, military service and marriage documents, etc., provided with your explicit consent for the administration of employee fringe benefits and entitlements

Your personal data may be processed for the following purposes.

Execution of Emergency Management Processes

Execution of Information Security Processes

Execution of Employee Satisfaction and Engagement Processes

Fulfillment of Employment Contractual and Statutory Obligations for Employees

Administration of Employee Fringe Benefits and Entitlements

Conducting Audit/Ethics Activities

Conducting Training Activities

Management of Access Permissions

Ensuring that Operations Are Conducted in Compliance with Applicable Law

Execution of Finance and Accounting Operations

Ensuring Physical Premises Security

Execution of Assignment Processes

Pursuit and Execution of Legal Affairs

Conducting Internal Audit / Investigation / Intelligence Activities

Conducting Communication Activities

Planning Human Resources Processes

Execution/Supervision of Business Activities

Conducting Occupational Health and Safety Activities

Conducting Business Continuity Activities

Organization and Event Management

Execution of Performance Appraisal Processes

Conducting Retention and Archiving Activities

Execution of Contractual Processes

Administration of Remuneration Policy

Ensuring the Security of Data Controller Operations

Conducting Talent/Career Development Activities

Disclosure of Information to Authorized Persons, Institutions and Organizations

Conducting Management Activities

For our Job Applicants;

Categories of Data	Examples of Data Types Processed in This Category
Identity Data	Your name, surname, date of birth, place of birth, gender, marital status
Contact Data	Your telephone number, residential address, e-mail address
Personnel Data	Your CV/resume, military service status information
Physical Premises Security Data	CCTV footage capturing you if you visit our company premises
Operational Security Data	Your IP address information, website access logs, etc., in the event of a visit to our company building

Professional Experience Data	Information regarding your work experience, educational background, diplomas, certificates, trainings received, skills, courses attended, driver's license information, SRC Certificate
Visual and Audio Recordings	Visual and audio recordings you have shared with our Company
Health Data	Information on chronic illnesses and disability status

Your personal data may be processed for the following purposes.

Conducting Candidate/Intern/Student Selection and Placement Processes

Conducting Application Processes for Job Applicants

Conducting Communication Activities

Planning Human Resources Processes

Pursuit and Execution of Legal Affairs

Ensuring that Operations Are Conducted in Compliance with Applicable Law

Ensuring Physical Premises Security

Conduct of Retention and Archiving Activities

In relation to our online visitors;

<https://alserotours.com/> online visitors who use our website;

Data Categories	Examples of Data Types Processed in This Category
Identity Information	First and last name information if provided in contact forms
Contact Information	Email address and telephone number information if provided via the contact form
Transaction Security Data	IP address information, website access logs, etc.
Marketing Data	Cookie records, information obtained from campaign activities, etc.

The above personal data may be processed for the following purposes.

- Carrying out activities in compliance with legislation,
- Implementation of information security processes,
- Tracking requests/complaints,
- Conducting communication activities,
- Disclosure of information to authorized persons, institutions, and organizations,
- Conducting advertising / campaign / promotion processes
- Conduct of retention and archiving activities
- To enable access to our website via the Internet.

With respect to our Customers and Prospective Customers;

The natural person customers, or the authorized persons and/or employees of our corporate customers;

Data Categories	Examples of Data Types Processed in This Category
Identification Data	Your name, surname, signature, Turkish ID Number (T.C. Identification Number), passport information, gender, date of birth, country, etc.
Contact Data	Your telephone number, postal address, email address
Legal Proceedings Data	Information in correspondence with judicial authorities, information in litigation files, etc.
Customer Transaction and Financial Data	Call center recordings, invoices, promissory note and cheque information, information on teller receipts, order information, request information, credit card details, bank account numbers, etc.
Transaction Security Data	IP address information, website access logs, etc. when using the website
Marketing Data	Cookie records, information obtained through campaign activities, etc.
Visual and Audio Records	Visual and audio recordings you have shared with our company with your explicit consent
Accommodation Data	Accommodation and tour duration according to the tour/service you selected, tour start and end dates, transportation details, room number, number of persons, etc.

Other Personal Data	Your insurance policy details, meal preference information, number of accompanying travelers
Health Data	Health data such as your disability or mobility limitations, allergies, special diet, regularly used medications, need for medical assistance, etc. will be processed with your explicit consent and, where necessary, shared with suppliers and business partners. Relevant personal data will be destroyed after completion of the service.

The above personal data may be processed for the following purposes.

Implementation of emergency management processes

Implementation of information security processes

Conducting activities in compliance with legislation

Carrying out finance and accounting operations

Ensuring physical premises security

Conducting communication activities

Execution and auditing of business operations

Carrying out logistics activities

Conducting contract processes

Conducting Hajj and Umrah activities

Monitoring and conducting legal affairs

Implementation of remuneration policy

Execution of assignment processes

Conducting marketing analysis studies

Conducting advertising / campaign / promotion processes

Conducting goods/services procurement processes

Provision of after-sales support services for goods/services

Conducting goods/services sales processes

Carrying out goods/services production and operational processes

Conducting customer relationship management processes

Conduct of retention and archiving activities

Execution of supply chain management processes

Disclosure of information to authorized persons, institutions and organizations

Ensuring the security of the Data Controller's operations

With respect to our supplier representatives and supplier employees;

The supplier representative and our supplier employee;

Categories of Data	Examples of Data Types Processed in This Category
Identity Data	Your name, surname, signature, Turkish Identification Number (T.C. Identification Number), etc.
Contact Data	Your telephone number, full address, e-mail address
Legal Proceedings Data	Information in correspondence with judicial authorities, information in court case files, etc.
Customer Transaction and Financial Data	Call center records, invoices, promissory note and cheque information, information on cashier receipts, order information, request information, credit card information, bank account number information, etc.
Professional Experience Data	Your educational status, diplomas, certificates, trainings received, skills, courses taken, copy of your driver's license, SRC Certificate, etc.
Visual and Audio Recordings	Your visual and audio recordings if shared with our company
Other Personal Data	TURSAB Certificate and Tax Plate of sole proprietorships, signature circular, signature, etc.

The above personal data may be processed for the following purposes.

- Execution of Emergency Management Processes
- Execution of Information Security Processes
- Conducting Activities in Compliance with Legislation
- Execution of Finance and Accounting Operations
- Execution of Assignment Processes
- Monitoring and Conducting Legal Affairs
- Conducting Communication Activities

- Conducting / Auditing Business Activities
- Execution of Goods / Services Sales Processes
- Execution of Customer Relationship Management Processes
- Conducting Activities Aimed at Customer Satisfaction
- Organization and Event Management
- Conducting Marketing Analysis Studies
- Execution of Storage and Archiving Activities
- Execution of Contract Processes
- Ensuring the Security of Movable Property and Resources
- Execution of Supply Chain Management Processes
- Execution of Remuneration Policy
- Execution of Product / Service Marketing Processes
- Ensuring the Security of Data Controller Operations
- Disclosure of Information to Authorized Persons, Institutions and Organizations
- Conducting Management Activities

With respect to our business partner representatives and employees;

Categories of Data	Examples of Data Types Processed in This Category
Identity Data	Your name, surname,
Contact Data	Your telephone number, full address, e-mail address
Legal Proceedings Data	Information in correspondence with judicial authorities, information in court case files, etc.
Customer Transaction and Financial Data	Call center records, invoices, promissory note and cheque information, information on cashier receipts, order information, request information, credit card information, bank account number information, etc.
Professional Experience Data	Your educational status, diplomas, certificates, trainings received, skills, courses taken, copy of your driver's license, SRC Certificate,
Visual and Audio Recordings	Your visual and audio recordings if shared with our company
Other Personal Data	TURSAB Certificate and Tax Plate of sole proprietorships, signature circular, signature, etc.

The above personal data may be processed for the following purposes.

- Execution of Emergency Management Processes
- Execution of Information Security Processes
- Conducting Activities in Compliance with Legislation
- Execution of Finance and Accounting Operations
- Execution of Assignment Processes
- Monitoring and Conducting Legal Affairs
- Conducting Communication Activities
- Conducting / Auditing Business Activities
- Execution of Goods / Services Sales Processes
- Execution of Customer Relationship Management Processes
- Conducting Activities Aimed at Customer Satisfaction
- Organization and Event Management
- Conducting Marketing Analysis Studies
- Execution of Storage and Archiving Activities
- Execution of Contract Processes
- Ensuring the Security of Movable Property and Resources
- Execution of Supply Chain Management Processes
- Execution of Remuneration Policy
- Execution of Product / Service Marketing Processes
- Ensuring the Security of Data Controller Operations
- Disclosure of Information to Authorized Persons, Institutions and Organizations
- Conducting Management Activities

How Are Your Personal Data Collected?

Your personal data specified in the categories above;

- Order forms, Contracts,
- by physical means such as visitor forms,

Information systems and electronic devices (e.g., telecommunications infrastructure, computers and phones),

Servers,

Our website,

other documents declared by the data subject

are collected by automated or non-automated means.

What Is the Legal Basis for the Collection of Your Personal Data?

Your personal data are processed by **Alsero Tourism Trade Limited Company** based on the provisions set out in Article 5 of the Personal Data Protection Law (KVKK) for the purposes described above;

Expressly prescribed by law,

When directly related to the establishment or performance of a contract; the processing of personal data of the parties to the contract is necessary,

Being necessary for the data controller to fulfill its legal obligations,

Being necessary for the establishment, exercise or protection of a right,

Being necessary for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject

- The data subject's
- explicit consent
- in case of

are processed on legal grounds.

Do We Transfer Your Personal Data to Third Parties?

Personal data relating to our employees:

Natural persons or private legal entities (such as law firms and certified public accountants whose services we retain)

- to our business partners,

to the banks, consulting firms, and insurance companies with which our Company has agreements

- to competent public authorities and institutions
- to our customers and our suppliers

For the purposes set out above and upon request as required by applicable legislation, they may be shared with law enforcement and judicial authorities.

Personal data relating to job applicants:

Your personal data may be transferred to judicial authorities or relevant law enforcement agencies for the resolution of legal disputes or upon request as required by applicable legislation.

Personal data of our online visitors:

For the purposes described above and upon request as required by applicable legislation, they may be disclosed to judicial authorities and competent public institutions.

Personal data of our customers:

Natural persons or private legal entities (such as law firms and certified public accountants whose services we retain)

- to our business partners
- to our suppliers
- to competent public authorities and institutions

For the purposes set out above and upon request as required by applicable legislation, they may be shared with law enforcement and judicial authorities.

Personal data of supplier representatives and supplier employees:

Natural persons or private legal entities (such as law firms and certified public accountants whose services we retain)

- to our business partners,
- to our other suppliers,
- to competent public authorities and institutions

For the purposes set out above and upon request as required by applicable legislation, they may be shared with law enforcement and judicial authorities.

Personal data of business partner representatives and supplier employees:

Natural persons or private legal entities (such as law firms and certified public accountants whose services we retain)

- Other business
- partners, T
- to our suppliers,
- to competent public authorities and institutions

For the purposes set out above and upon request as required by applicable legislation, they may be shared with law enforcement and judicial authorities.

Transfer of Personal Data Abroad

For the performance of overseas tours, identity, contact and necessary operational information may be shared with hotels, carriers, local agents, guides, insurance/assistance providers and official authorities in foreign countries.

Transfers abroad are carried out on the basis of the adequacy decision, appropriate safeguards or ad hoc transfer conditions provided for in Article 9 of the Personal Data Protection Law (Law No. 6698), as applicable to the specific case; and are implemented with data minimization and the necessary technical and administrative measures.

In the case of regular transfer relationships, the required standard contractual clauses, notifications, undertakings or other appropriate safeguard procedures are applied. Additional security measures are taken for special categories of personal data.

How Can You Exercise Your Rights Regarding Your Personal Data?

You may submit your requests within the scope of Article 11 of the Personal Data Protection Law regarding the rights of data subjects to **Alsero Tourism Trade Limited Company** via the "**Data Controller Application Form**" prepared to facilitate this for you, in accordance with the "Communiqué on Procedures and Principles Regarding Applications to the Data Controller" posted at alserotours.com.

Data Controller: Alsero Tourism Trade Limited Company

Address: Balgat 1410 Street No. 2/1 Çankaya - Ankara

Email: kvkk@alserotours.com

Bu belge elektronik ortamda oluşturulmuştur; SHA256 + HMAC + hash-zinciri ile bütünlüğü ispatlanır.