

INFORMATION ON THE LAW ON THE PROTECTION OF PERSONAL DATA

A. PURPOSE OF THE PERSONAL DATA PROTECTION AND PROCESSING POLICY:

As the “Company”, in accordance with the Personal Data Protection Law No. 6698 (“KVKK”), we would like to inform you within the scope of Article 10 titled “Data Controller’s Obligation to Inform” and Article 11 titled “Rights of the Data Subject”, regarding the purposes of processing your personal data, to whom and for what purpose your processed data may be transferred, the method and legal reason for collecting your personal data, and your other rights listed under Article 11 of the KVKK.

As the data controller, we process, record, transfer, share, and store your personal data within the framework and limits imposed by official legislation as explained below.

Our Company reserves the right to update this “Personal Data Protection Clarification Text” at any time in line with changes to the current legislation.

B. COLLECTION, PROCESSING, AND PURPOSES OF PROCESSING PERSONAL DATA:

Our company, operating in the fields specified in detail in its Articles of Association, collects and processes your personal data due to such activities—both in line with the regulations of the Ministry of Tourism, Revenue Administration, and other relevant institutions, and due to contracts we have entered into.

Your personal data may be collected and processed verbally, in writing, or electronically. These data are used to provide services related to our company's business, to improve service quality, to perform marketing, sales, and other operations, and to fulfill data retention, reporting, and notification obligations.

Additionally, your data may be used in customer relationship management (CRM) practices aimed at enhancing service quality and improving sales and marketing activities.

Your personal data will not be used for any other purposes without your explicit consent, and will not be shared or transferred to third parties except for legal obligations or official authorities.

Within the framework of KVKK Article 5/2, your personal data may be shared—subject to adequate precautions—with our subsidiaries, directly or indirectly affiliated companies, business partners, authorized dealers, and domestic or foreign institutions, as necessary for the provision of value-added services or when legally required.

Your data may be collected through automatic or non-automatic means such as offices, branches, dealers, call centers, websites, social media channels, mobile apps, and similar tools.

As long as you benefit from our products and services, your personal data may be processed and updated.

Furthermore, personal data may be processed when:

- a. You contact our call center or use our website,
- b. You visit our company, website, or social media channels,
- c. You participate in our trainings, seminars, or events.

With your consent or based on lawful reasons under Turkish law, your data may be used for:

- (i) Enabling our business units to perform necessary work for offering products/services;

- (ii) Personalizing services according to your preferences and habits;
- (iii) Ensuring legal and commercial security for our company and its partners;
- (iv) Improving the quality of our services and policies;
- (v) Informing you about general and special campaigns and promotions;
- (vi) Fulfilling your requests through user logins on our platforms;
- (vii) Managing loyalty programs and memberships;
- (viii) Providing information related to your inquiries and service requests;
- (ix) Defining and implementing our commercial and business strategies;
- (x) Executing our human resources policies;
- (xi) Meeting legal obligations.

C. METHOD AND LEGAL BASIS OF PERSONAL DATA COLLECTION:

Your personal data is obtained in any verbal, written, or electronic environment, for the purposes stated above, in order for our Company to provide its products and services within the defined legal framework and to fulfill its contractual and legal obligations in a complete and accurate manner.

The personal data collected for this legal reason is processed, recorded, transferred, shared, and stored by our Company for the purposes stated in Article (B) of this text and under the personal data processing conditions and purposes specified in Articles 5 and 6 of the KVKK.

D. PROCESSING OF SENSITIVE PERSONAL DATA:

Sensitive personal data, as defined in Article 6 of the KVKK, may be processed only with the explicit consent of the data subject or in cases stipulated by the law.

Our Company takes the necessary administrative and technical measures prescribed by the Personal Data Protection Board while processing sensitive personal data.

These data may only be processed to the extent permitted by law and solely for the purposes mentioned in this text.

E. TRANSFER OF PERSONAL DATA:

Your personal data may be transferred to third parties (such as business partners, suppliers, legally authorized public institutions and private individuals) within the framework of the personal data processing conditions and purposes specified in Articles 8 and 9 of the KVKK, in line with the purposes stated in this clarification text.

In addition, your personal data may be transferred abroad, provided that the conditions set forth in Article 9 of the KVKK are met, and adequate protection is ensured.

F. RIGHTS OF THE DATA SUBJECT:

Within the scope of Article 11 of the KVKK, data subjects have the following rights:

To learn whether their personal data is being processed,

To request information if personal data has been processed,

To learn the purpose of processing and whether it is being used in line with that purpose,

To know the third parties to whom personal data is transferred domestically or abroad,

To request the correction of personal data if it is incomplete or incorrectly processed,

To request the deletion or destruction of personal data within the framework of the conditions set forth in Article 7 of the KVKK,

To request notification to third parties to whom the data has been transferred, regarding corrections or deletions made under Articles 7 and 11,

To object to results arising against them through the exclusive analysis of processed data via automated systems,

To request compensation in case of damage due to unlawful processing.

G. MEASURES FOR DATA SECURITY:

Our Company takes the necessary technical and administrative measures to ensure the appropriate level of security in order to:

Prevent the unlawful processing of personal data,

Prevent unauthorized access to personal data,

Ensure the protection of personal data.

In this regard, our Company carries out regular audits and updates security systems to ensure data confidentiality, integrity, and accessibility.

H. DURATION OF PROCESSING YOUR PERSONAL DATA:

In accordance with the Law on the Protection of Personal Data (KVKK) Article 7/f.1, the personal data processed for the purposes stated in this “Clarification Text on the Processing of Personal Data” will be deleted, destroyed or anonymized by us when the purpose requiring processing ceases or when the statute of limitations required for processing your data under the legislation elapses.

I. CIRCUMSTANCES IN WHICH OUR COMPANY MAY PROCESS YOUR PERSONAL DATA WITHOUT EXPLICIT CONSENT:

According to Article 5 of the KVKK, our Company may process your personal data, obtained legally as specified above, without explicit consent in the following cases:

1. Cases explicitly stipulated in laws;
2. When you are legally unable to give consent due to factual impossibility, and processing is absolutely necessary to protect your or another person’s life or bodily integrity;
3. When necessary for the establishment or performance of a contract to which our Company, its affiliates, related persons, or legal entities – with whom you have entered into a contract – are parties;
4. When required for our Company to comply with a legal obligation;
5. When your personal data has been made public by you;
6. When processing is necessary for the establishment, exercise or defense of a right;

7. When processing is necessary for our Company's legitimate interests, provided it does not harm your fundamental rights and freedoms.

J. TO MAKE AN APPLICATION UNDER THE LAW ON THE PROTECTION OF PERSONAL DATA:

In accordance with Article 13(1) of the KVKK, you may submit your request regarding the exercise of your rights above to our Company through the methods determined by the Personal Data Protection Board. Alternatively, if you prefer, you can submit your application in writing, under the Law on the Protection of Personal Data.

To exercise your rights under Article 11 of Law No. 6698, you can always contact us by sending an e-mail to **info@lucidabeach.com**

Please note:

- Only applications from the data subject regarding his or her own personal data will be considered.
- Applications without official identity documentation will not be processed.
- Even if a request for deletion is fulfilled, if required by official authorities, we remain obliged to share the data with them.