

initiative INFORMATION NOTICE ON THE WEBSITE OF LUCIS GLOBAL TURISTIK YATIRIMLAR VE İŞLETMECİLİK TİCARET ANONİM ŞİRKETİ

As Lucis Global Turistik Yatırımlar ve İşletmecilik Ticaret Anonim Şirketi (LUCİS) [Büyükdere Cd. No. 161, Levent, 34394 Şişli/ISTANBUL], we use cookies to ensure the functionality of our websites during your visits and offer you a better experience. Under the Law No. 6698 on the Protection of Personal Data (Law), we exercise care to fulfill our obligations regarding your personal data while using this technology as "Data Controller".

This information notice has been prepared to inform you about the collection and processing of the personal data of the visitors to LUCIS websites through cookies. It will be updated in the event that the cookies on the website are removed, renewed, increased, or new technological means other than cookies are started being used.

I. YOUR PERSONAL DATA THAT ARE COLLECTED

As LUCIS, we collect data from visitors to our websites through cookies.

II. PURPOSES OF PROCESSING OF YOUR PERSONAL DATA

LUCIS processes the data collected through cookies for the purposes below:

- Performing the basic functions necessary for the website to operate properly,
- Analyzing the activities of the visitors on the website and enhancing the performance of the website,
- Offering a better visiting experience on the website.

In the event of a change in the purposes of processing of the personal data collected on the website or emergence of a new purpose, LUCIS will additionally and immediately fulfill its obligation to inform you before starting the data processing activities for this purpose.

III. THE METHOD OF AND LEGAL GROUNDS FOR COLLECTION OF YOUR PERSONAL DATA

LUCIS collects the personal data of website visitors for the purposes above entirely by automatic methods, in the form of information, visitor entry and exit records and numerical data obtained in the electronic environment and digital format.

LUCIS processes your Personal Data on the basis of the following legal grounds:

- Presence of an express consent granted by you
- The data processing activity being mandatory for the data controller to fulfill its legal obligation

- The data processing activity being mandatory for legitimate interests of the data controller, provided that no harm is caused to the basic rights and freedoms of the website visitor.

LUCİS uses the following cookies on its website:

ASP.NET_SessionId	This is a cookie that manages the website visitor's session without collecting personal data.
_ga	This is a cookie used to distinguish visitors from one another.
gat	This is a cookie used to limit the number of the requests directed to Google Analytics.
gid	This is a cookie used to distinguish visitors from one another.

IV. THE PERSONS TO WHOM PERSONAL DATA MAY BE TRANSFERRED AND THE PURPOSES OF TRANSFERS

In relation to the transferring of Personal Data, LUCIS guarantees to the website visitors that it will act in accordance with the provisions and principles in the Law on the Protection of Personal Data, the decisions and regulations published by the Personal Data Protection Authority, and other legislation.

It may transfer your personal data domestically to the following groups of receivers only for the purposes of processing and to the extent required by these purposes:

- Natural persons or private law legal entities, authorized public institutions and organizations

V. YOUR RIGHTS UNDER THE LAW ON THE PROTECTION OF PERSONAL DATA

In relation to your personal data collected and processed by LUCIS, you may exercise your rights under Article 11 of the Law No. 6698 on the Protection of Personal Data in accordance with the "Communique on the Procedures and Principles Regarding Applications to the Data Controller".

In order to exercise your rights under the Law No. 6698 on the Protection of Personal Data, you may fill the document "Application Form for Data Subjects' Applications Pursuant to the Law on the Protection of Personal Data" available in digital form on <u>https://www.lucisinitiative.com/</u> and in printed form at the workplaces of the company, and:

- deliver it to the workplaces of the company in the form of a wet-signed document by yourself or via your attorney who holds a special power of attorney,
- send it via a notary public,
- Sign it with safe electronic signature or mobile signature and send it in digital format to the address in an e-mail whose subject reads "Request for Information under the Law on the Protection of Personal Data",
- Send it from your e-mail address registered in our system, which our company was previously notified of, to the address in an e-mail whose subject reads "Request for Information under the Law on the Protection of Personal Data".

The requests specified in the applications will be fulfilled by LUCIS free of charge as soon as possible depending on the characteristics of the request and in no later than thirty days. However, the fee in the tariff specified by the Board may be charged in the event that the procedure requires additional costs.