1-Introduction

During your use of our websites and mobile applications, cookies and similar technologies (web beacons, pixel tags, etc.) are used to improve your experience.

This cookie policy text has been prepared to inform You as the relevant person about the principles regarding the collection, recording, use, storage, storage, sharing with third parties, and processing of Your data through cookies used during the use of our website and mobile applications.

What types of cookies are used on our website, for what purposes, and how you can control these cookies are explained below.

2-What is the Relationship between Cookies and Your Data?

The data obtained through cookies may be non-personal data, such as preferred language settings, or personal data that identifies you as an individual or can be associated with you as an identified or identifiable individual, such as IP address, username, unique identifier, or email address.

3-Personal Data Collected

Depending on your preference settings, through cookies

The browser and operating system you use,

IP address

Login information such as username, password,

Email address,

Your device and location,

Randomly generated identification number,

Unique identifier,

Date and time of your visit,

Interaction status (e.g., whether you can access the site, whether you received an error alert etc.),

Use of features on the site,

Search phrases,

Navigational information, including how often you visit our site,

Scrolling gestures,

Data on user transaction logs, including information about the tabs you accessed

Data such as etc. can be processed.

4-What are Cookies and Similar Technologies?

Cookies or cookies are small text (data) files stored on your computer, mobile device, or network server by the websites and mobile applications you visit and can be read by these websites when you visit the same site later.

Cookies are classified as "first-party cookies - third-party cookies" according to their source, "temporary cookies (session cookies) - persistent cookies" according to their storage period, and "mandatory cookies (strictly necessary cookies) - functional cookies - performance cookies (analytical cookies) - advertising/marketing cookies" according to their intended use.

5-What is the Difference between First Party Cookies and Third Party Cookies?

First-party cookies are identified by the website you are browsing and can only be read by that website.

Third-party cookies are defined by other organizations used for different services. They are cookies owned and executed by third parties, such as business partners or service providers.

How Long is a Cookie Stored?

Temporary cookies (session cookies) are created during your visit to the website and are only valid until you close your browser.

Persistent cookies are created when you visit the website and remain until you delete them or they expire. Persistent cookies are used to provide a personalized experience compatible with your settings.

6-What are cookies used for?

We use cookies and similar technologies to ensure that your visit to our website is carried out appropriately and that your information is remembered for your subsequent use, to improve the functioning and content of the site, to statistically evaluate the use of the site, to present the content on the site in the most effective way for you and your device, and to provide users with personalized services and advertisements in line with their preferences and usage habits.

Mandatory cookies (strictly necessary cookies) are cookies that are necessary to visit the website and to benefit from the content of the website.

Functional cookies give the website the function of remembering users' internet preferences like you have made. Through these cookies, website operators such as us can store information such as the user's choice of language, the region in which the user is located, and the username and password used. These cookies serve to individualize the website's content according to the visitors' preferences.

Performance cookies (analytical cookies) can determine how the user uses the website (such as which page they visit and which link they click on), but these determinations are in no way used to identify the person. The primary function of these cookies is to increase the website's functionality through anonymous information.

Advertising/marketing cookies collect information about users and provide them with content and advertisements of interest.

7-Which Cookies Do We Use on Our Website?

Our Company uses the types of cookies described in the table below. You can check the storage period and source for each cookie file and the purpose for which this Cookie is used here.

Cookie Name

Objective

Storage Period Source

Mandatory Cookies

ebg1#lang, cbg1#lang, solar#lang	This Cookie is used for your language preference so that we can provide you with relevant content and services according to your preference.	During the session	Accra Hotels
_hjFirstSeen	The Cookie is set so that Hotjar can track the beginning of the user's journey for the total number of sessions. It does not contain any identifiable information.	30 minutes	Hotjar
_dc_gtm_UA-96537466-6	This Cookie is associated with sites that use Google Tag Manager to load other scripts and code on a page. It can be considered Strictly Necessary where it is used because, without it, other scripts may not work correctly. The end of the name is a unique number that is also an identifier for an associated Google Analytics account.	1 minute	Google Tag Manager
_dc_gtm_UA-96537466-8	This Cookie is associated with sites that use Google Tag Manager to load other scripts and code on a page. It can be considered Strictly Necessary where it is used because, without it, other scripts may not function	1 minute	Google Tag Manager

	properly. The end of the name is a unique number that is also an identifier for an associated Google Analytics account.		
_hjAbsoluteSessionInProgress	The Cookie is set so that Hotjar can track the beginning of the user's journey for the total number of sessions. It does not contain any identifiable information.	30 minutes	Hotjar
_ym_uid	Used to identify users on the website.	One year	Accra Hotels
cf_bm	This Cookie is used to distinguish between humans and bots. This is useful for the website to make accurate reports about the use of the websites.	30 minutes	Insider
_dc_gtm_UA-96537466-9	This Cookie is associated with sites that use Google Tag Manager to load other scripts and code on a page. It can be considered Strictly Necessary where it is used because, without it, other scripts may not function properly. The end of the name is a unique number that is also an identifier for an associated Google Analytics account.	1 minute	Google Tag Manager

_ym_d	It is used to store the first visit to the site.	One year	Accra Hotels
_ga_5DNB6TWTHG	Google Analytics uses this Cookie to maintain the session state.	One year and one month	Google Analytics
_gat_UA-88906541-1	This is a pattern-type cookie set by Google Analytics, in which the pattern element in the name contains the unique identification number of the account or website to which it relates. It is a variant of the _gat cookie used by Google to limit the data saved on websites with high traffic volumes.	1 minute	Google Analytics
_ga	This cookie name is associated with Google Universal Analytics, an essential update to Google's more widely used analytics service. This Cookie distinguishes unique users by assigning a randomly generated number as a customer identifier. It is included in every page request on a site and is used to calculate visitor, session, and campaign data for the site's analytics reports.	One year and one month	Google Analytics

_ga_ZQ1CZRWC4R	Google Analytics uses this Cookie to maintain the session state.	One year and one month	Google Analytics
_ga_36JV9QGPV8	Google Analytics uses this Cookie to maintain the session state.	One year and one month	Google Analytics
_gid	Google Analytics sets this Cookie. It stores and updates a unique value for each page visited and is used to count and track page views.	1 day	Google Analytics
_ga_0VEL176M3T	This is a pattern-type cookie set by Google Analytics, where the pattern element in the name contains the unique identification number of the account or website to which it relates. It is a variant of the _gat cookie used by Google to limit the data saved on websites with high traffic volumes.	1 minute	Google Analytics
_ga_TS9RELFSLZ	Google Analytics uses this Cookie to maintain the session state.	One year and one month	Google Analytics
Functional Cookies			
tabs-sid	They are used to identify users on the website.	During the session	Yandex
thn_id	This Cookie is created to identify users with a unique ID consisting of hexadecimal	One year	The Hotels Network

	characters. This Cookie determines the user on their next visit to the hotel's website or other hotels in the network. This Cookie allows the analysis of the user experience.		
visid_incap_2454396	This Cookie is created to identify users with a unique ID consisting of hexadecimal characters. This Cookie determines the user on their next visit to the hotel's website or other hotels in the network. This Cookie allows the analysis of the user experience.	12 months and four days	The Hotels Network
nlbi_2454396	This Cookie is created to identify users with a unique ID consisting of hexadecimal characters. This Cookie determines the user on their next visit to the hotel's website or other hotels in the network. This Cookie allows the analysis of the user experience.	session	
incap_ses_128_2454396	This Cookie is created to identify users with a unique ID consisting of hexadecimal characters. This Cookie determines the user on their next visit to the hotel's website or other hotels in the network. This Cookie allows	session	The Hotels Network

the analysis of the user experience.

Performance Cookies

yandexuid	It records data about the website behavior of visitors. This is used for internal analysis and website optimization.	One year and one month	Yandex
Amex	Stores auxiliary information for Yandex.Metrica's performance: ID creation time and alternative values.	One year	Yandex
_ym_isad	This Cookie determines whether a User has ad blockers	20 hours	Yandex
i	Collects information about visitor behavior across multiple websites. This information is used on the website to optimize the relevance of advertising.	One year and one month	Yandex
bh	Collects information about visitor behavior across multiple websites. This information is used on the website to optimize the relevance of advertising.	One year	Yandex

Advertising/Marketing Cookies

IDE	Doubleclick sets this Cookie	One year	Doubleclick
	and provides information		

	about how the end user uses the website and the advertisements the end user may have seen before visiting that website.		
guides	Collects information about visitor behavior across multiple websites. This information is used on the website to optimize the relevance of advertising.	One year	Yandex
_fbp	Meta uses it to deliver various advertising products, such as real-time bidding from third-party advertisers.	Three months	Meta
_gcl_au	Google AdSense uses it to test advertising effectiveness on websites that use its services.	Three months	Google Adsense
tips	It records data from multiple visits and about visitors on various websites. This information is used to measure the effectiveness of advertisements on the websites.	30 minutes	Teads

8-How to Block or Refuse Cookies

You can enable or disable cookies by changing the settings of your browser. However, in this case, utilizing some or all site functions may not be possible. Some cookies, such as technical cookies, which are mandatory for the site's functioning, cannot be disabled.

You can find out how to set your browser to block or warn you about these cookies by clicking on the link for the relevant browser:

Google Chrome

Microsoft Edge

Mozilla Firefox

<u>Safari</u>

<u>Opera</u>

To change your cookie preferences, please visit the **<u>Cookie Preferences</u>** page.

9-Method and Legal Grounds for Collecting Personal Data

Your data is collected automatically by our website through cookies. Limited to the purposes listed above, your data is collected by automatic means based on the legal reasons listed in paragraph 2 of Article 5 of the Law on the Protection of Personal Data, explicitly stipulated in the Law, data processing is mandatory for the establishment, use or protection of a right, it is compulsory for our Company, which is the data controller, to fulfill its legal obligation, and the legitimate interest of our Company provided that it does not harm the fundamental rights and freedoms of the person concerned, is processed by our Company.

However, there is no data processing condition other than explicit consent regarding functional cookies, performance (analytical) cookies, and advertising/marketing cookies other than strictly necessary cookies. In that case, we ask you whether you consent to using these cookies. If you agree to use these cookies, your data is processed based on the legal reason that the data subject has explicit consent.

10-Transfer of Personal Data

We may transfer/share your data with 3rd parties in the following recipient groups:

We may share **with service providers** for website operations, data analysis, payment processing, order fulfillment, reservation and reservation confirmation processes, customer service, email sending, and marketing.

When you stay at one of our affiliated properties **with Onsite Service and Agency Providers**, we may share your information with them to provide you with their marketing services and marketing about services at our properties such as spa, restaurant, health club, concierge, and other outlets.

We may share it **with Contracted Organizations** for purposes such as obtaining discounted services and facilitating your service purchase during your use of our Facility so that you can benefit from the services of natural and legal persons such as airlines, car rental, and travel agencies.

Group Companies and other companies within Barut Hotels for purposes such as personalizing the services and products we will offer you, facilitating your transactions, communicating with you, enabling you to benefit from our loyalty programs, and realizing our business purposes.

Suppliers and Service Providers and natural and legal persons such as reservation process providers, wifi, wifi interface providers, secure payment systems, insurance companies, transfer companies, and travel agencies about the needs to make products and services available to You.

We may share this information **with consultants** to plan on legal, financial, and investment issues, identify risks, conduct business and transactions, etc.

We may share it **with financial institutions** for the realization of payment transactions and execution of investment processes.

We may share **with Public Institutions** to fulfill obligations arising from the legislation, protection of public health, ensuring security, prevention, detection and investigation/prosecution of crimes, prevention of force majeure situations, etc.

In addition, the data that you share for reasons such as reservation in our facilities, visiting our facilities, staying, etc., may be transferred to different countries for reasons such as server system, cloud storage system, payment systems of banks, headquarters of the intermediary organizations where reservations are made in other countries, etc.

11-Rights of the Data Subject as a Data Subject

As a relevant person, by applying to our Company,

To request whether personal data is processed or not, and if processed, to request information about it,

Learn the purpose of data processing and whether it is used for its intended purpose,

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

To request correction of personal data in case of incomplete or incorrect processing,

To request that it be deleted or destroyed if the conditions for processing are no longer applicable and, if it has been transferred, to notify the third parties to whom it has been assigned,

In the event of damage caused by unlawful processing of personal data, to demand compensation for the damage,

You have rights.

Requests regarding the rights of the relevant persons and the implementation of the Law may be submitted in writing to the "Şirinyalı Mah. Lara Cad. No:24 Muratpaşa / Antalya" address. Our Company shall respond to these requests without charging a fee for up to ten pages if a written response is to be given and by setting a transaction fee of 1 Turkish Lira for each page over ten pages. If the answer to the application is provided in a recording medium such as CD, or flash memory, the fee that the Personal Data Protection Authority may request will not exceed the cost of the recording medium.

12-Identity of the Data Controller and Application to our Company

Data Controll	er : BHM Otelcilik A.Ş.
Representati	ve : Faruk Calis
Address	: Sirinyali Mahallesi Lara Cadde No: 24/ Muratpasa Antalya
Telephone	: 242 310 99 99
E -Mail	: faruk.calis@bhmotelcilik.com

According to paragraph 1 of Article 13 of KVK Law No. 6698, your request to exercise your rights mentioned above,

A signed copy of your application containing your explanations, with official documents identifying your identities such as identity card, driver's license, and passport by hand to "Şirinyalı Mahallesi Lara Cadde No: 24 / Muratpaşa Antalya" address,

Your application with a wet signature and official documents identifying you through a Notary Public,

Submit your application and identification documents electronically to faruk.calis@bhmotelcilik.com with a secure electronic signature or mobile signature,

Or by using the electronic mail address you have previously notified our Company and registered in our Company's system,

As such, you can communicate it with the method(s) determined / to be determined by the Personal Data Protection Board with the regulations in the KVK Law and the relevant legislation.

Depending on the nature of your request, our Company will ensure that your application is finalized within 30 days at the latest.

You may exercise your rights regarding personal data only about your data, and no requests may be made regarding 3rd parties. You can contact us at our addresses and phones written above to get more information about our practices regarding protecting personal data and your rights.

Cookie Policy Updated: June 2023