

## **Our Privacy Statement and Personal Data Policy (Last Update on 20.02.2018)**

We would like to inform you that protecting your personal information is very important and we respect their privacy. We have drafted this Privacy Policy to explain how we use and protect the personal information you share with us. This Policy is valid for all users who use our services on [www.flaptour.com.tr](http://www.flaptour.com.tr) ("Site") and other congress and event websites and all information given to us. We strongly point out that you have read, reviewed and accepted the terms of the Privacy Statement with the purchase of the services provided and/or mediated by Flaptour. By using our website and services and/or purchasing services, you accept the practices and rules set forth in this Privacy Policy.

Flaptour complies with the legal regulations on privacy in force in Turkey . Flaptour reserves the right to amend, change, add or remove the provisions of this Privacy Policy within the scope of the legislation. Any changes on this Privacy Policy will also be posted on this website. We encourage you to check our website from time to time to keep up with the most current version of our privacy policy. You can see if the Privacy Policy has been revised since your last visit to our site by looking at the "Last Update" date on this page. Please read this Privacy Policy carefully. By using our site and/or purchasing services, you agree to be bound by this Privacy Policy without limitation, eligibility or modification. In case you do not accept all the terms and conditions herein any time, you must immediately cease using this site.

### **1. Which data do we collect**

We collect two types of information through our website: "Personal Information" and "Non-Personal Information": Personal Information is the information that identifies or can identify you as an individual (such as residence address, telephone number or billing information), and Non-Personal Information is bulk information, demographic information, IP addresses, and direct other information that does not reveal your identity.

**a. Non-Personal Information:** When you visit or interact with our site, third parties having made a contract with Flaptour to provide online services via Flaptour may collect your Non-Personal Information (for example, a catalogue of the Site pages you visit). Non-Personal Information is information that is anonymous and does not personally identify you. Non-Personal Information is generally collected through our site from four different sources: Internet protocol addresses and web logs, cookies, pixel tags and other similar technologies.

**b. Personal information:** Congress, meeting, seminar organized and/or participated by Flaptour It pays attention to respecting the privacy of the users/visitors/customers who visit the website and use its applications for the provision of flight ticket and transfer services with the organizations and the security of their personal data. All websites organized by Flaptour,

in particular [www.flaptour.com.tr](http://www.flaptour.com.tr) and all of its applications will be briefly referred to as the "Site")

Flaptour is responsible for the storage and security of personal data obtained about you. In addition, we wish to point out that your personal data cannot be forwarded to third parties without your consent and cannot be used for purposes other than those notified to you.

### **Users' Rights Regarding Personal Data**

As per Article 11 of the Personal Data Protection Law ("PDPL"), users and members may apply to the representative to be announced by Flaptour, and they have the following rights about their personal data:

Learn whether it is processed or not,

- Request information if it has been processed,
- Learn the objective of processing and whether it is used in compliance with this objective,
- Know the third persons inland or abroad to whom the data is transferred,
- Request for correction if it is deficient or processed wrong,
- Request for deletion / termination in the framework of conditions stipulated in article 7 of PDPL,
- Requesting notification of the transactions made in accordance with subparagraphs (d) and (e) above, to third parties to whom personal data has been transferred,
- Objecting to the emergence of a result against him by analysing the processed data exclusively with automatic systems,
- Demanding for the compensation of the damage in case of loss due to the unlawful processing of personal data.

The Data Controller representative to be appointed by Flaptour will be announced in the Data Controllers Registry when the legal infrastructure is provided and announced on the website [www.flaptour.com.tr](http://www.flaptour.com.tr) or the website organized by Flaptour in accordance with the legislation. About your personal data, if you want to refer to the rights you have as per Article 11 of PDPL or if you have any questions about your personal data, you can always contact us sending an e-mail to [kvkk@flaptour.com.tr](mailto:kvkk@flaptour.com.tr)

## **2. How do we use the collected data?**

We know that protecting the data you share with us is very important. We take appropriate security measures within the scope of the legislation to help protect this data from unauthorized access and disclosure. For example, we may access, procure, use, process and/or transfer your personal data within the scope of the legislation. We also encrypt credit card numbers and other sensitive information before your computers send them to ours. We also use firewalls to help prevent unauthorized access to your personal data.

You can feel safe while using our website. However, no system is completely secure. Although we take all necessary steps to protect your information, there is always the possibility that you may be out of security. For this reason, you should be very careful when carrying and disclosing your personal data. For example, avoid sending personal information by e-mail.

As a rule, although it is not possible to process personal data without the explicit consent of the person concerned, in the presence of any of the situations

\_"it is necessary to process the personal data of the parties to the contract, provided that it is directly related to the establishment or performance of a contract", "Data processing is mandatory for the establishment, exercise or protection of a right" , "It is mandatory for the data controller to fulfil its legal obligation", "the data subject has been made public by himself", "The data processing is mandatory for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject" and / or "it is clearly stipulated in the laws", it may be possible to process personal data without seeking the explicit consent of the person concerned.

#### **a. Non-Personal Information:**

**Since Non-Personal Information cannot personally identify you, we may use this information for any purpose. For example, we may use the visit hours to our website, the average time spent on our site in order to diagnose and administer our site and the problems with our servers, to analyse and improve our the features and functionality of our site.** In addition, we reserve the right to share this non-personal information that does not personally identify you with third parties for any purpose. We may also share this information with third parties who are not part of the Flaptour family for use for advertising purposes or in bulk or other ways that will not disclose any of your Personal Information.

**b. Explicit Consent to Personal and/or Special Personal Data:** Users of our website and/or persons who share personal data consent to the receipt, processing and domestic/international transfer of their personal/or special quality personal data by examining the "Information Text within the Scope of the Law on the Protection of Personal Data" published on our website.

By purchasing services such as congresses, meetings, seminars, accommodation, air tickets and field transfers organized by Flaptour, our customers will have given permission within the scope stipulated by the legal regulation accessing the "Confirmation Text within the Scope of the Personal Data Protection Law" on our website to receive, process and transfer domestic / international personal data of personal and / or special nature.

If necessary permissions are not given for personal data, it should be taken into consideration that some features on the Site may not be available, the service may not be provided partially or completely, in other words, accommodation/flight ticket/area transfer purchase may not be possible. Without prejudice to the exceptions, it should not be ignored that the provision, processing and transfer of personal data is necessary for the provision of these services. In this context, user data remains outside the scope of PDPL. **Flaptour does not accept any responsibility and Flaptour has no responsibility for the inability to sell services due to the lack of necessary consent for the provision, processing and/or transfer of personal data.**

**How do we process your Personal Data?** Your personal and/or special quality personal data that we as Flaptour and our affiliates collect with your consent in the capacity of data controller, or through our websites and social media pages and/or all kinds of channels including but not limited to these, can be obtained, recorded, stored, stored, changed, updated, periodically checked, rearranged, classified, retained for the period required for the purpose for which they are processed or stipulated in the relevant law, can be shared with / transferred to private-legal persons with whom the company works, or public institutions and organizations that it is legally obliged to in case of legal or service-related actual requirements, and / or relevant 3rd person real person / legal persons residing in Turkey or abroad, insurance companies, banks, and may be transferred abroad or processed, including preventing its use, in case of legal or service-related actual requirements. In this respect, any kind of operation on your personal and/or private personal data that you share with our Company with your consent such as obtaining, recording, storing, preserving, changing, rearranging in whole or in part by automatic or non-automatic means provided that it is a part of any data recording system and disclosure, transfer, takeover, making available, classification or prevention of use will be performed by us in accordance with the Law.

**How do we collect your personal data?** Your personal data and/or data of special quality can be collected verbally, in writing or electronically with your consent through our website, sales and marketing department employees, collection forms, our website/social media/organizers/business partners and all kinds of channels.

**What is the Status of the Data Prior to the Publication of the Law?** As per the terms of the Law, "Your personal data processed before the publication date of this Law will be harmonized with the provisions of this Law within two years from the date of publication. On the other hand, consents obtained in accordance with the law before the publication date of the Law are deemed to have been accepted in accordance with this Law, unless a statement of intent is made to the contrary within one year. We would like state that Flaptour customers are deemed to have accepted the Terms of Use and Privacy Policy by purchasing services from Flaptour, and since there are detailed regulations in our Privacy Policies regarding the supply, processing and transfer of your personal and/or sensitive personal data, you have "lawful consent" given to us regarding your personal / or sensitive personal data that we have obtained and processed before the publication date of the Law. As per the Law, your consents

are deemed to be compliant with the Law unless a contrary statement is made within one year.

**What are the purposes and legal reasons for the processing of your personal data?** We will obtain and process your personal and/or sensitive personal data that you share with us in accordance with the Personal Data Protection Law No. 6698 and the relevant legislation in order to inform, market and distribute the service purchased from Flaptour, to perform the services we provide to our customers in accordance with the requirements of the contract and technology, and to improve the products and services we offer you.

In addition, in order to determine the information of the transaction owner to be used in all kinds of products and services within the scope of the legislation and record the identity, address and other necessary information in order to provide the service provided by our customers through Flaptour, to arrange all records and documents that will be the basis for the transaction in electronic or paper environment, complying with the information storage, reporting and notification obligations requested by the authorities, being able to provide the requested products / services and fulfilling the requirements and content of the service you request and the contract also constitute the purposes and reasons for the processing of your personal data.

As a rule, although it is not possible to process personal data without the explicit consent of the person concerned, in the presence of any of the situations

\_"it is necessary to process the personal data of the parties to the contract, provided that it is directly related to the establishment or performance of a contract", "Data processing is mandatory for the establishment, exercise or protection of a right" , "It is mandatory for the data controller to fulfil its legal obligation", "the data subject has been made public by himself", "The data processing is mandatory for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject" and / or "it is clearly stipulated in the laws", it may be possible to process personal data without seeking the explicit consent of the person concerned.

The details of the purposes of using and processing your personal data are summarized below;

**i. Site:** We may use the Personal Data you provide with your consent to improve the website based on your interests, show you the content you may be interested in, and display the content depending on your preferences.

**ii. Communication:** We may use your Personal Information with your consent to provide you with information about Flaptour and its services and promotions on behalf of some of our partners.

**iii. Administrative issues:** Flaptour reserves the right to contact you in the event of any changes to the Terms of Use and/or this Privacy Policy of our Site or to inform you about other administrative matters regarding our site (e.g. contacting you to facilitate, complete or confirm a transaction).

**iv. Fulfilling Requests and Facilitating Transactions:** In order to meet your requests and facilitate their processing (eg. buying a flight ticket) with your approval Flaptour may use your personal data. On the other hand, in accordance with the legislation, "it is necessary to process the personal data of the parties to the contract, provided that it is directly related to the

establishment or performance of a contract", "Data processing is mandatory for the

\_establishment, exercise or protection of a right", "To fulfill the legal obligation of the data controller In case of any of the situations such as "obligatory to be processed by the data controller", "being made public by the data subject", "processing the data is compulsory for legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject" and/or "explicitly stipulated by the laws", It will be **possible to process personal data without seeking explicit consent.**

**v. Special Processing Purposes:** We may also use your Personal Information, with your consent, for ad targeting, data analytics, audits, fraud prevention and other internal business purposes.

**vi. Shopping / Commercial Services:** When you purchase products through the Site, we may collect your credit card number, billing address and other information regarding that purchase (collectively, "Payment Information") from you with your consent. We will use the Payment Information you provide with your consent to bill you for your purchase and to process your purchase. When you give us your Payment Information, you authorize us to provide such information to third parties with your consent as and when necessary to confirm and fulfil your order (for example, to process your credit card number).

**vii. Share on social media:** Our site allows you to forward links of certain events announced or site features with your consent to others by e-mail or Social Media Services you believe will be interested.

**viii. Bulletin subscription:**

### **c. Job Postings**

When you apply for a job and submit your personal information on our website, this information will only be used by Flaptour to evaluate your application and process your application. We may retain your personal information for a period of time with your consent to evaluate your application for current or future positions.

### **3. Information about the persons or organizations to which we can transfer your personal data:**

Persons/organizations to whom your personal and/or special quality personal data that you shared with us for the above-mentioned purposes can be transferred with your consent, our direct/indirect domestic/foreign affiliates, program-service partner persons and organizations that we receive services from/cooperate with to carry out our activities, banks, domestic / foreign organizations and other relevant third parties. In this context, we would like to emphasize that our Company, that collect your personal and/or private personal information, can share them with the banks it works with and/or other relevant third parties (car rental companies, insurance companies, courier/cargo companies and not limited to the service provided, depending on the scope of the requested service, related persons and organizations) and transfer them to the country and/or abroad.

**a Communications with Affiliates:** Commercial electronic messages within the scope of the contract can be sent to you, provided that your prior consent is obtained. Since it is possible to obtain this approval in writing or by all kinds of electronic communication tools, we remind you that if you do not want to receive commercial electronic messages within the scope of the contract, you must remove the check mark in the "sending electronic message" section. You also have the right to reject receiving commercial electronic messages at any time without giving any reason. On the other hand, we also wish to point out that if you provide contact information for getting into contact with you, no separate consent will be obtained for changes in the services provided and/or commercial electronic messages for use.

In addition, it is legally possible to communicate for marketing, promotion and/or change services related to the same or similar services without obtaining a new consent if your consent is obtained during the provision of the service.

However, you reserve the right to refuse such communication and withdraw the permissions you have given in this context, and it will be sufficient to communicate your request to us by any means. If you choose to participate in the pre-approved e-mail system, our affiliates may also send you announcements and notices of events, products or services that may be of interest to you.

We would like to repeat that you can withdraw your prior consent at any time.

**b Flaptour Service Providers:** We work with third parties as service providers, including but not limited to data analysis, credit card processing and other administrative tasks. If you use our services, we reserve the right to share your Personal Information with these third parties within the framework of your consent and to the extent necessary, in order to provide the relevant services. We take all reasonable measures to ensure that these third parties treat your Personal Information as we do, and third parties will be responsible for the protection of your personal data within the scope of the legislation.

**c Other purposes:**

We may share your Personal Information, exercise any right or objection, or waive them if there is a court order or similar investigation request, if there is a request for cooperation from an authorized government agency, to defend against legal claims, or in other cases where legally required to establish or enforce our legal rights.

**4. Collection of Data by the Third Parties**

**a. Ads of the Third Parties:** Advertisements appearing on our site are served to you by our third party advertising partners. Third parties advertising on our site may set or recognize a unique cookie on your browser. Non-Personal Information about your site visits, such as the number of times you view an



ad, may be used to serve ads to you.

**b. Links to the Third Parties:** Our site may contain links to third party websites that are not owned or operated by Flaptour. We put these links only for your convenience only. Placing a link on our site does not mean that the site linked by Flaptour is secure and/or approved. If you provide your Personal Data to any such third party website, your transaction will be carried out by the website of that third party (not by www.flaptour.com.tr); and the Personal Data you provide will be collected by that third party and controlled by their privacy policy. Flaptour is not responsible for the privacy practices of these websites or the content of these third party websites, including their use of any Personal Data you provide to them. In addition, Flaptour is not responsible for the privacy practices or content of other linked websites, or the privacy policies and practices of third parties, or the "personal data" collected, processed, transferred or used by third parties.

## 5. Policy for Pre-approved Options With Your Consent

**Flaptour Communications:** Once you have provided Flaptour with your personal information and given your consent, you may be asked, at Flaptour's discretion, to indicate whether you are interested in receiving information about special offers relating to the Site, our Flaptour advertisers and our partners. We may occasionally send you marketing communications when you choose to sign up to receive these communications. We also remind you that you are entitled to unilaterally withdraw from receiving these communications at any time.

You can any time choose not to receive weekly information and promotional emails. You also have the right to opt out of receiving these messages in the future by clicking on the "unsubscribe" link in the emails we send you. It can take up to 3 business days for us to process a deregistration request.

We may send you e-mail communications regarding services you have purchased from Flaptour, even if you have opted out of receiving event and promotional emails from us. These may be emails regarding the status of your transaction, delivery of your vehicle, and customer service with up-to-date information about your vehicle.

Note that unsubscribing from email communications will only affect future communications you receive from us. If we have sent your information to a third party with your consent before you change or update your preferences, you may also need to change your preferences regarding that third party.

**b Communications with Affiliates and Third parties:** As the case may be, at Flaptour's discretion and with your consent, you may be given the opportunity to sign up for our affiliates and/or third parties' contact lists. If you choose to accept any such offer(s), we may share all Personal Data you provide to Flaptour for these purposes with our affiliates or these third parties, with your consent and

to the extent necessary. If you change your mind and no longer wish to share your Personal Data with our affiliates and/or third parties for marketing purposes, you may opt out of future communications any time by following the above procedure.

**6. Access, Update or Delete Information Collected About You:** Our site also gives you the opportunity to delete or change the Personal Information you have provided to us, within the scope of PDPL. Provided that this information is in our databases, we will respond to your change requests as soon as possible within the scope of legal provisions. Regarding the other rights you have under the PDPL, you can refer to the "Information on the Protection of Personal Data" section of this text that we quoted above.

**7. Security of your personal data:** Flaptour takes security measures within the scope of legislative provisions, including physical, electronic and operational measures, in order to ensure the security of Personal Data collected through its site and to prevent unauthorized access.

While Flaptour takes all necessary measures to protect the Personal Data under its control, all data communications over the Internet or any form of data storage cannot be guaranteed to be 100% secure. We are not responsible for any damages you may suffer as a result of interruption, alteration or misuse of data during these transfers. Please contact us at [kvkk@flaptour.com.tr](mailto:kvkk@flaptour.com.tr) if you have any reason to believe that there is a breach of security of the site.

**8. Online and Offline Applications:** Note that this Privacy Policy applies only to online information collection and dissemination applications in connection with our site, and not to any of our offline applications.

**9. Contacting Flaptour regarding the Site:** If you have any questions or requests regarding this Policy, you can send these questions and/or requests to [kvkk@flaptour.com.tr](mailto:kvkk@flaptour.com.tr) by e-mail. Note that email communications may not necessarily be secure. For this reason, do not use your credit card information and other sensitive information in your e-mail correspondence with us.