

Protection of Personal Data and Privacy Policy

Web Site Privacy Statement

Hereby the conditions described in this “ Privacy Policy” will be describing how Oyster Residences will be able to use and protect the personal information we obtained through you visiting our website ,using the services provided by our website ,or the information we acquire in order for you to receive the services we provide. By visiting our website and using the services provided by the website you hereby accept the conditions set forth in this “Privacy Policy” .

I. Purpose of Protecting and Processing Personal Data

Until today at Oyster Residences (OYSTER) due sensitivity of the work and on the data acquired from our customers and prospective customers it was kept confidential and never shared with third parties. Protecting personal data is our company's basic policy. Before any legal arrangements, our company and our affiliates have given great importance to the confidentiality of personal data and have adopted this as a working principle and given their employees working instructions in line with this principle. OYSTER is committed to comply with all the responsibilities of the Personal Data Protection Act. This principle regarding the protection of personal data also includes our affiliates.

II. The scope and change of personal data protection and processing

Policy has been prepared by our company according to Turkish Commercial Code #6698 “Personal Data Protection Law”(KVKK)

We will use the information provided by you to ensure compliance with law in order to improve the quality of our services and quality policy.

OYSTER Personal Data Protection and Processing Policy, aims to protect and improve the protection of our customers,customers to be,our employees,the companies working with us in partnership and their customer’s data .

Our company has the right to change our policy in accordance with above mentioned Law inorder to improve the protection of the personal data .

III. Basic rules on the processing of personal data

a) Conformity to laws and honesty: OYSTER, questions the source of the personal data collected by us or the third parties that this collection is done in accordance with the law and in the framework of honesty . Based on this Oyster may make necessary warnings and notices for protection of personal data to third parties (including agencies and other brokerage houses)

b) Accurate and up-to-date data : OYSTER makes sure the data are accurate, do not contain false information, and if it is changed and informed necessary updates to be made immediately..

c) Processing DATA for specific, clear and legitimate purposes: OYSTER, only processes the data limited to, required for services provided and only for the data given permission to be used for specific purposes.in which it is in accordance to content . Apart from business purposes does not process, use, or let others use the data.

d) Linked, limited and used cautiously for the purpose which they are intended: OYSTER, uses the data limited to purpose and extent of service required.

e) Keep for the time required for the purposes stated in the relevant legislation : OYSTER, keeps the contractual data during terms determined by law of trade conflict and the requirements of the tax law. When these durations are over the data is erased or anonymises the data.

As Little information As Possible,

According to our principle of as little information as possible , at OYSTER we only process the data that is needed . Unnecessary data are not collected. Data received from third parties are also processed by Oyster if needed into our systems . Extra information is not registered to the system, deleted or made anonymous. These data may be used for statistical purposes. Special quality data like Health data are collected in order to provide better service to our customers and to protect their health .These are kept in confidentiality.

Deletion of Personal Data

When the statutory deadlines expire, judicial process is in completion or other requirements cease to exist, our company will delete, destroy or anonymize personal data on its own or upon the request of the person concerned.

Accuracy and Data Update

The data contained in OYSTER is processed as the rule declares on the declaration of the persons concerned. OYSTER does not have to investigate the correctness of the data declared by the customers or contact persons with OYSTER, nor is it due to our legal and working principles. The declared data is considered correct. The correctness and update of personal data has also been adopted by OYSTER. We update the personal data that our company has been processing based on the official documents or the request of the concerned person

. Privacy and Data Security

Personal data is confidential and OYSTER respects this privacy. Personal data may only be accessed by authorized persons within the company. All necessary technical and administrative measures are taken to protect the personal data collected by OYSTER and to prevent unauthorized access and to prevent our customers and prospective clients from becoming victims. In this framework our softwares are in line with the standards,we have careful selection of third parties and insist in-house data protection policy.

IV. Data processing purposes

OYSTER's personal data collection and processing is carried out in line with the objectives. The data collected are processed to establish the contract with customers and to provide better service to the customers.

V. Customer, prospective customer and business and solution partner data

Collection and processing of data on contractual relationship.

If a contractual relationship has been established with our customers and prospective customers, the collected personal data can be used without the consent of the customer. However, this use takes place in the direction of the contract purpose. In accordance with the requirements of the contract for better service , the data are used and updated when necessary. However, the client candidates data (potential clients) given to us is registered to provide easier and more quality service for them. These data may be deleted upon request of the client if the contractual terms are not committed .

Business and Business Partner Data

OYSTER is in compliance with law when sharing data with business partners as a principle. With the business and solution partners, with the commitment of data confidentiality, the data shared only is as required by the service. Also the partners are requested to take action and precautions in data security as required by law ..

Advertisement data processing

Regulation of E-Commerce Press Release Regarding Commercial Communication and Commercial Electronic Communications by Law

An electronic message for advertising may only be sent to persons who have already been approved in accordance with the regulation. It is imperative that the approval of the person to whom the ad is sent is explicitly present. OYSTER complies with the details of the "approval" determined in accordance with the same legislation. The approval to be obtained must include all commercial electronic communications that your company sends to the electronic contact addresses of the buyers in order to promote, market, promote their business or increase their recognition with content such as celebrations and wishes. This approval may be obtained in writing in physical media or by any means of electronic communication. The important thing is that the buyer has a positive will statement, his / her name and surname as well as the electronic contact address that the buyer agrees to send the commercial electronic message. The data transactions made because the company has legal obligations or explicitly foreseen in his opinion. Personal data, may be processed without further consent for the fulfillment of the legal obligation.

Company Data Processing

Personal data may be processed in accordance with the company's service and legitimate purposes in no way be used for unlawful services.

Processing Specially Qualified Data

According to the law, people's race, ethnicity, political thought, philosophical belief, religion, sect or other beliefs, costumes and clothes, association, foundation or trade union membership, health, sexual life, data on criminal convictions and security measures and biometric and genetic data are qualified personal data. OYSTER is also responsible for the processing of personalized personal data and shall take adequate measures to process as law and determined by the Board.

OYSTER, with the consent of the person may only process the special qualified data to provide the services determined .

Data Processed with Automated Systems

OYSTER on the subject of the processed data obtained through the automatic systems treats the information according to the existing law. The obtained data can not be processed without the explicit consent of the people against them .But OYSTER may decide to use which the data in its system to perform services .

User Information and Internet

In case through OYSTER's websites and other systems or applications data is collected , Oyster informs the related people about the privacy rules and cookies when using this data. Users are informed about use of private data on our web pages as well as informed about that these data will be processed according to the law. The information about the cookies we used and will be used in our web sites is as below .

Use of Cookies

Cookie Types

Google (analytics, doubleclick)

Measuring

Advertisement

Internal improvements of the site

Functional and analytical cookies

Commercial cookies

Functional and Analytical

Cookies involve the data to remind you your preferences , the efficient use of your website,how to optimize the site and respond to user requests . Due to the nature of this type of cookies,the may possess user name, personal your information etc.

Third Party Cookies

OYSTER internet sites are working with third-party trusted, well-known advertising providers.Third-party service providers may use their own cookies in order to provide special ads for users .These cookies used by Third parties collects the information about users selection of internet sites and analysis how they use these sites .,

Commercial Cookies

It serves to enhance your user experience by presenting a product / content similar in scope to your interests and selections, and by offering a more sophisticated, personalized ad portfolio. The above session is permanent, functional, and the background retention time for analytical and commercial cookies is approximately 2 (two) months and can be adjusted in the personal internet browser settings. Removal from these settings may vary based on the Internet browser.

How Can I Remove Cookies?

Many internet browsers allow your computer to automatically detect cookies from the sites and is set to use. Using your internet browsers' Help' or 'Settings' menü you may prevent the cookies from being sent or be alerted when a cookie is sent .To learn different ways of managing cookies and how to adjust your setting to manage your browser you may use your browsers instructions and help menü.

VI. Employee Data

The personal data of our employees is registered and processed ,for business relations,health insurance or leagl requirements may be done by Oyster without the employees consent .However Oyster is liable to protect and keep the data private for their employees unless required officially and described in law.

Processing due to Legal Obligation

OYSTER,may process or register the personal data of its employees,according to the conditions defined in the legislation or to fulfill a leagly defined responsibility without taking any consent from its employees. This is limited to the obligations arising from the legislation .

Employee data processing for benefit of employees

OYSTER, may use and process the employee data for the benefit of workers like for health insurances without the consent of employees. Also if there are any conflicts due to business issues Oyster may use the employee data without consent of employees..

Processing Specially Qualified Data

According to the law, ethnicity, political thought, philosophical belief, religion, sect or other beliefs, costume and clothing,membership to association and foundations or trade unions, health, sexual life, criminal conviction and data about security measures,biometric ,and genetic data are considered qualified special personal data . OYSTER also takes adequate measures in the processing this type of data and follows legislation and rules determined by Board.Special personal data may only be processed without the consent of the person concerned limited to the cases

allowed in the Law. In order for our employees to benefit from insurance and health services, the qualified data obtained from them are used only for this purpose.

Employee Data Processed in Automated Systems

The data handled in relation to the employees in relation to the automated systems can be used in internal audits and performance evaluations. Our employees have the right to appeal against the consequences against them, and they do so in accordance with internal procedures. Employees' objections are also assessed within the company.

Telecommunication and Internet

The computer, telephone, e-mail and other applications assigned to the employees within the company are assigned to the employee only for business purposes. It can not be used for any other means than the company has assigned to it for its special purposes and communication. The Company may control and inspect all data on these devices. The employee undertakes not to have any data or information other than work on the assigned computer, on the phone, or on other devices from the time he / she commences employment.

VII. Transferring personal data both domestically and internationally

Personal data may be shared with business and solution partners and with OYSTER subsidiaries in order to perform the services required.

OYSTER, may send personal data to the following persons and institutions for specific purposes:

- To ensure that the partnership's purpose of establishment is met, limited to OYSTER's business partners;
- To carry out the activities of our company , Oyster's Subcontractors and companies used to ensure commercial services necessary to carry out our activities;

- To OYSTER's solution partners with limited to providing the execution of business activities that require participation of our company's affiliates,
- To OYSTER's affiliates.

OYSTER has the authority to transfer personal data in accordance with the other conditions in the Law and in accordance with the conditions determined by the Board and the person content within the country and abroad ;

III. Rights of the person concerned

OYSTER acknowledges that the relevant person has the right to give consent before the data is processed and has the right to determine the destiny of the data after the data has been processed.

The people whose personal data are processed may referred to the person declared on our web site for the following :

- A. To learn whether your personal data has been processed or not ;
- B. Requesting information about personal data that has been processed,
- C. Requesting to learn the reasons of processing personal data and whether they are used appropriately for their purpose;
- D. Requesting to know the third parties to which personal data has been transferred in Turkey or abroad,
- E. If any of the personal data is missing or incorrectly processed, correct the data if they want to;
- F. Based on the law to request deletion or destroying of personal data within the terms and conditions;

G. To request transactions carried out in accordance with subparagraphs F, D and E are notified to third parties to whom personal data are transmitted,
H. Objection to the occurrence of a result against the person by analyzing the processed data exclusively through automated systems,
I. In the event of personal injury due to the illegal processing of personal data have the right to demand that the damage be resolved. On the other hand, people have no right or benefits for anonymized data within the Company.

OYSTER may share personal data with related institutions and organizations that have judicial authority and state authority in accordance with mandates based on business and contractual relations.

Personal data holders may claim their rights, mentioned above, through our official website, www.oysterresidences.com by filling out the form provided in the below link, and sending it to the company with the copy of their personal identity card.

Application form

Your application will be answered with 30 days after receipt of the form and documents. Applications need to be sent with registered letter. In addition, only your part of the application will be answered and no application will be accepted about your partner, spouse or your friend. OYSTER may request additional information and documents other than already sent.

IX. Privacy Policy

Whether it is employees, other people's data they are private in Oyster. No one shall use, copy, reproduce, transfer or otherwise use this data for any other purpose without contractual or canonical compliance

X. Operation safety

At Oyster there are technical and administrative measures taken to protect the personal data from disqualified, unauthorized persons.

This framework ensures that software conforms to standards, that third parties are carefully selected and that data protection policies are respected within the company. Measures for safety are constantly being renewed and improved.

XI. Audit

OYSTER carries out internal and external audits on the protection of personal data.

XII. Notice of Violations

When OYSTER is notified of any infringement of personal data, it will act immediately to ensure that such breach does not occur. It reduces the damage of interest the least and compensates the loss. When unauthorized personal data is obtained from outside, the situation is immediately reported to the Personal Data Protection Board. You may apply for notification of violations in accordance with the procedures set out at <http://www.oysterresidences.com/>.

After you have received and filled out the form below for your requirements, you will need to send it as a registered mail to the following address:

Oyster Residence
Ölüdeniz Belcekiz Mevkii 1.Sokak Ölüdeniz
48340 Fethiye/TÜRKİYE
Tel : +90 252 617 07 65
Fax : +90 252 617 07 64
E-Posta : info@oysterresidences.com

CUSTOMER INFORMATION TEXT ON THE PROTECTION OF YOUR PERSONAL INFORMATION IN ACCORDANCE WITH THE PROTECTION OF THE PERSONAL DATA ("KVKK") NUMBER 6698

As Oyster Residences ("OYSTER"), we are sensitive to protect your personal data .. With this awareness, as OYSTER, we pay great importance to registering and the processing of personal data of all persons related to OYSTER, including beneficiaries , in accordance with the Protection of Personal Data Act No. 6698 ("KVK Law"). We fully understand the responsibilities and process your personal data as described below and within the limits imposed by the legislation

1. Collection, Processing and Processing Purposes of Personal Data

Your personal data is subject to OYSTER service, product or commercial activity with varying degrees of variability; written or electronic, by means of automated or non-automated means, such as offices, websites, social media circles, mobile applications and the like. Your personal data will be processed by being created and updated for as long as you benefit from OYSTER's products and services.

Also, when you use our internet page with the intention of using OYSTER services, If you visit OYSTER or our internet site, your personal data will be processed when you attend seminars or organizations organized by OYSTER.

Your personal data will be collected from the products and services offered by OYSTER. OYSTER 's legal and commercial security of the persons in the business relationship with OYSTER is to be used by the related departments of OYSTER and OYSTER for commercial and personal use of the products and services offered by OYSTER, customs according to your liking, usage habits and needs, will be processed in accordance with the personal data processing requirements and purposes set out in Articles 5 and 6 of the KVK Law for the purpose of identifying and implementing business strategies and conducting OYSTER's human resources policies..

2. To Whom and How the Processed Personal Data Can Be Transferred:

Your collected personal data collected by OYSTER offers you products and services necessary work to be done by our units, OYSTER products and services offered to you, your taste, usage habits and OYSTER 's legal and commercial security of the persons in business relationship with OYSTER and OYSTER 's business and business strategies are determined and implemented and OYSTER 's human resources policies are carried out for the purpose of conducting business partners, suppliers, authorized public authorities and private persons within the framework of the personal data processing requirements and purposes set forth in Articles 8 and 9 of the Law on the Code of Conduct.

3. Method of Collecting Personal Data and Legal Reason:

Your personal data, collected in any oral, written or electronic form, the products and services offered by OYSTER in the direction of their aims can be presented in the determined legal framework and that OYSTER can fulfill the responsibilities arising from the contract and law in a complete and correct manner. Your personal data collected for this legal reason can also be processed and transmitted to the purposes stated in items (1) and (2) of this text within the scope of the personal data processing requirements and purposes stated in Articles 5 and 6 of the Law on the Code.

4. The Rights of the Personal Data Holder as stipulated in Article 11 of the KVK Law
As personal data owners, if you submit your requests for your rights to OYSTER by the methods set forth below, OYSTER shall conclude the request within the shortest time and latest within thirty days according to the nature of the claim. However, if the transaction also requires a cost, OYSTER will charge the fee specified in the Personal Data Protection Board.

This includes personal data owners;

- To learn whether personal data is processed,
 - Requesting information about personal data if it has been processed,
 - To learn the purpose of processing personal data and the appropriate use
 - Knowing the third parties to which personal data are transferred in Turkey or abroad,
 - If personal data is missing or incorrectly processed, and the third party to whom the process of doing so involves the transfer of personal data to be notified,
 - To be processed in accordance with Law No. 6698 and other related laws
- However, in the event that the reasons for which it is required to be processed are not met, deleted or destroyed, and that the process to be notified to the third party to whom the data is transmitted,
- By analyzing processed data exclusively through automated systems objecting to the emergence of a consequence against him / herself,
 - In case of personal injury due to the processing of personal data unlawfully have the right to demand that the damage be resolved.

You may transmit your request to use OYSTER in writing or by other means determined by the Personal Data Protection Board in accordance with paragraph 1 of Article 13 of Law No. 6698. Since the Personal Protectors Protection Board has not determined any method at this stage, you need to submit your application to OYSTER in writing in accordance with Law No. 6698.

[Personal Data Application Form](#)