POLICY ON COOKIES IN COMPLIANCE WITH LAW ON PROTECTION OF PERSONAL DATA

As Nemil Turizm Tekstil A.Ş. (It will be referred as "Nemil" or "Company" in this Policy), we make use of cookies in order to improve your experience during your visits to our online media and process your personal data.

Processing of personal data is defined as; any operation performed upon personal data such as collection, recording, storage, retention, alteration, re-organization, disclosure, transferring, taking over, making retrievable and classification in Law on Protection of Personal Data, Article 3. The use of these technologies is conducted in accordance with the legislation we are subject to, in particular with the 'Law No. 6698 on the Protection of Personal Data,'.

The purpose of this Cookie Policy is to inform you about the processing of personal data obtained through cookies used by website users ("Data Subject") during the visits made to the website that we operate at "www.lasagradahotel.com.tr" ("Web site"). As Nemil Turizm Tekstil A.Ş., we may opt out of using the cookies on our website, modify their types or functions, or add new cookies to our website. Therefore, we reserve the right to amend the provisions of this Cookie Policy at any time. You may find more detailed information regarding processing of your personal data by Company, in the Policy of Nemil Turizm Tekstil A.Ş. (Lasagrada Hotel Istanbul) on Protection and Processing of Personal Data which can be found in:

"http://media.lasagradahotel.com/d/lasagrada/media/NEMİL_TURZM_TC.A.._KVK_POLTKASI_6b173d.pdf"

Main Purposes for Cookie Usage on Our Website

➢ Improving performance of the website,

➢ Improving and facilitating the services offered to you through the website,

➢ Introducing new features through the website and customizing the features according to your preferences,

➢ Ensuring legal and commercial security of you and our company,

➢ Preventing fraudulent transactions on the website,

➢ Fullfilling of legal and contractual obligations, especially the law on regulation of publications on the internet and suppression of crimes committed by means of such publications no.5651 and Regulation on basis and procedures of the law on regulation of publications on the internet.

As per Articles 5 and 8 of Law on Protection of Personal Data, in the existence of the conditions in the relevant legislation your personal data will be processed in accordance with your explicit consent, otherwise without obtaining your explicit consent in line with the purposes indicated above.

As Nemil Turizm Tekstil A.Ş., we may transfer your personal data that are within the scope of the cookie policy to our vendors, statutory authorities and legally authorized private persons limited to the fulfilling of purposes indicated above.

Personal Data Collection Methods

Cookies are used in order for you to make the most of the services offered to you on "www.lasagradahotel.com.tr" website and improve your user experience. Cookies are small files stored in your network server by the websites you visit through browsers.

If the use of cookies is not preferred, it is possible to delete or block cookies from your browser settings. Nevertheless, we would like to remind you that disabling cookies may affect the operation of the site. Unless you change your Cookie preferences from your browser, the default setting is the acceptance of Cookie usage.

Our Company may match the information collected by company at different times via the website through different methods (offline/online) and use such information together with the information received from other sources like third persons. Based on the data obtained from the users whose browsing information is recorded, our Company may implement targeted marketing and advertising technology in order to present ads that may be of interest to potential users.

Information about the cookies used for the purpose of collecting navigation information will be provided with a pop-up screen on the website when this service is used for the first time.

Cookie Types

a.Types of Cookies with Regard to Duration of Retension

➢ Session Cookies:

Session cookies ensure that the website works properly during your visit. They are used to ensure the security and sustainability of our web sites on your visit. Session cookies are temporary cookies used during our visitors' visits to the website, which are deleted after the browser is closed.

➢ Permanent Cookies:

Such cookies are used to remember your preferences and are stored on your device through browsers for your next visit to the web site. Persistent cookies remain stored even after you close your browser you have visited or after you restart your computer. These cookies are kept in your browser's subfolders until they are removed from your browser settings.

b.Types of Cookies According to Usage

➢ Required Cookies:

These cookies are required for the proper operation of the web site. Required cookies are used to properly manage the system, create user accounts and log in, and prevent fraudulent transactions. In the absence of these cookies, the web site will not function properly.

➢ Functional Cookies:

Functional cookies are used in order to facilitate your visit to the website and improve your experience on the website. These cookies allow you to easily access the contents by remembering your previous visit to the website.

➢ Analytical Cookies:

Analytical cookies contain data that allows us to see which pages attract more attention, which resources are viewed more and we can see the traffic on our sites and provide appropriate services to that traffic. These type of cookies record the information anonymously.

➢ Advertising Cookies:

Advertising or also known as targeting cookies are that allow us to identify and present content that is close to your area of interest. Third party advertising cookies may be placed on our website, mobile site and on other websites where we advertise in order to identify you and serve you specific ads. They are also used to determine the effectiveness of an advertising campaign.

Cookies Used on Our Website

Cookie Service Provider	Name	Purpose	Type	Time
	Server Cookie (BIGipServerpool_htb -clusterX)		**Required**	
	Toolbox login status cookie (CONDORSESSIONID, toolboxBarPosition)		**Required**	
	Cookie banner (useCookies, useCookiesCounter)		**Required**	
Google Analytics	**_ga**	Used to distinguish users.	**Performance**	**2 years**

Google Analytics	**_gid**	Used to distinguish users.	**Performance**	**24 hours**
Google Analytics	**_gat**	Used to throttle request rate.	**Performance**	**1 minute**
Google Analytics	**_gac_ <property-id>**		**Performance**	**90 days**
Google Analytics	**_utma**	Used to distinguish users and sessions.	**Performance**	**2 years**
Google Analytics	**_utmt**	Used to throttle request rate.	**Performance**	**10 minutes**
Google Analytics	**_utmb**	Used to determine new sessions/visits.	**Performance**	**30 minutes**
Google Analytics	**_utmz**	Stores the traffic source that explains how the user reached the website.	**Performance**	**6 months**
Google Analytics	**_utmv**		**Performance**	**2 years**
Hotjar			**Performance**	
Piwik			**Performance**	
	Google DoubleClick		**Advertising and Third Party**	
	Google Maps		**Advertising and Third Party**	
	AddThis		**Advertising and Third Party**	
	Triptease		**Advertising and Third Party**	
	SaleCycle		**Advertising and Third Party**	

Other Cookies Which are Used

Name	Purpose	Type	Time
	For those customers who enable location-based or currency based promotions (and require the end-user to consent to receiving those promotions), a cookie is dropped on the end user's browser so that when the user completes booking, the correct promotional pricing is provided.	iHotelier	30 days
Employee Login Status Cookies	This is a session-based cookie that tracks hotel employees logged in status.	GMS (Guest Management Solutions)	30 minutes
End User Login Status Tracking	This is a token used for tracking an end user's logged in status. Does not contain any personally identifiable information and expires after 45 minutes from last issue.	GMS (Guest Management Solutions)	45 minutes
Clickstream Marketing Tracking Cookie	This is a cookie dropped on hotel websites & booking engines (that are receiving Clickstream marketing services) to track marketing email click-throughs and to optionally tag known end users who made specific page visits and/or for remarketing to booking abandonments.	GMS (Guest Management Solutions)	1 year
	These are cookies that are dropped on the hotel website through a tag manager implementation. This tag is generated through the advertising platforms used for the applicable media network e.g., Google. These cookies contain information about the user's browser such as preferances, browser type, location, IP and language.	Media	2-45 days
		Meta	

	These cookies collect information about your social media usage. For example; cookies can be used to use the information of your Facebook/Twitter accounts to create personalized ads or conduct market research. It allows to use anonymous segments as target groups for user's Facebook and Instagram ads based on user's movements within the site.	**Social Media**	

Cookies Used on Our Website

Technical Cookies	The technical cookies are used to ensure the operation of the website and to determine non-functioning pages and areas of the website.
Flash Cookies	Types of cookies used to activate the image or audio content on the website.
Customization Cookies	They are cookies used to remember users' preferences when visiting different pages of a different website. For example, remembering your choice of language.
Analytical Cookies	Analytical cookies are the cookies that provide the production of analytical results such as the number of visitors to the website, the detection of the pages displayed on the website, the hours of website visits, the scrolling of the website pages.

What Are Your Rights As a Data Subject?

Under Law on Protection of Personal Data Article 11, data subjects have the following rights with regards to their personal data:

- ✓ To learn whether their personal data are processed or not,
- ✓ To demand information if their personal data are processed,
- ✓ To learn the purpose of their data processing and whether this data is used for intended purposes,
- ✓ To know the third parties to whom their personal data is transferred at home or abroad,

- ✓ To request the rectification of the incomplete or inaccurate data, if any; and to request notification of the operations carried out within this scope to third parties whom their personal data has been transferred,
- ✓ To request deletion or destruction of their personal data, and to request notification of the third parties to whom their personal data has been provided, about the transactions performed in this way, if the reasons for processing no longer apply to their personal data, which in any event, has been processed in accordance with the provisions of Law on Proctection of Personal Data and other concerned regulations,
- ✓ To object to the processing, exclusively by automatic means, of their personal data, which leads to an unfavourable consequence for the data subject,
- ✓ To request compensation for the damage arising from the unlawful processing of his personal data.

In case you submit your requests regarding these rights using the methods set out in "Data Subject Application Form" which you can find in "http://media.lasagradahotel.com/d/lasagrada/media/Nemil_Bavuru_Formu_c0258f.pdf" web site; your application will be processed and concluded as soon as possible and within 30 (thirty) days at the latest. Although the main principle is that we do not charge any fees for the requests; Company still reserves the right to charge fees based on the tariffs set by the Personal Data Protection Board. Data Subject acknowledges that if he/she makes a request preventing the Company from using any of his/her personal data, then he/she will not be able to fully benefit from the functionality of the Web site and personally bear the full responsibility regarding this.

How can I decline or disable cookies?

a.On a Computer

You can uninstall these cookies in two ways.

On the one hand, you can consult the cookies already installed on your terminal through the use of your browser, and delete them one by one by type of cookies as indicated in the banner or all at once.

- Apple Safari Browser: "Confidentiality" section in the "Preferences" menu, provided section for "Cookies and other data of Internet websites".

- Google Chrome Browser: "Confidentiality" section in the "Parameters" menu, "Content Parameters" subsection, provided section for "Cookies and website data".

- Internet Explorer Browser: "Tools" menu, then "Internet Options" section, then "General" then "Browser history", then "Parameters", then open the "Parameters of temporary internet files and history" window, and finally, "Display files".

- Mozilla Firefox Browser: "Tools" menu, "Options" section, "Privacy" subsection, "Delete specific cookies" functionality.

Furthermore, you can program your Internet browser to block or receive a warning for all installations of cookies on your terminal. The steps to follow differ for each type of browser, but you can find instructions in the "Help" section of the latter.

b. On a Smartphone or a Tablet

- Android Browser: Open your "Home" screen, Tap your web browser icon, Tap the "Menu" button, Tap the "Settings", Your device will either take you to a menu of available settings OR it will have one of the three following options. Tap on the option you have: Privacy & Security, Privacy, Security option Tap on "Clear Cache" ,Tap "OK" to confirm, Tap "Clear all cookie data" Tap "OK" to confirm, Click the "Home" button to go back to your "Home" Screen Restart your device by turning it off and then on again.

- Google Chrome Browser: On your browser toolbar, click "the Chrome menu" Click "More tools" and "Clear browsing data" In the box that appears, click the checkboxes for "Cookies and other site and plug-in data" and "Cached images and files." Use the menu at the top to select the amount of data that you want to delete. Choose "beginning of time" to delete everything. Click "Clear browsing data".

- Apple iOS 8: Click the "Home" button, Tap the "Settings" button, Scroll down to "Safari", Tap on "Clear History and Website Data". You will receive a warning message. Tap on "Clear History and Data" to confirm, Click the "Home" button to go back to your "Home" Screen, Restart your device by turning it off and then on again.