FREE HORSES TRAVEL

TÜRSAB Certificate No: 10978

PRIVACY NOTICE UNDER THE TURKISH PERSONAL DATA PROTECTION LAW

1. DATA CONTROLLER

Under Turkish Personal Data Protection Law No. 6698 ("KVKK"), your personal data are processed by the following travel agency in its capacity as data controller:

Travel Agency: FREE HORSES TRAVEL

TÜRSAB Certificate No: 10978

Official Website: www.ride4culture.org

Trade Name: ZEK ELEKTRİK ELEKTRONİK VE HIRDAVAT MALZEMELERİ TİC.LTD.ŞTİ

Address: KUMLUOVA MAHALLESİ LETOON CADDESİ NO:65 SEYDİKEMER/MUĞLA

E-mail / KVKK Application Address: info@ride4culture.org

2. PERSONAL DATA THAT MAY BE PROCESSED

Depending on the nature of the service and transaction, the following personal data may be processed:

Identity data: name, surname, date of birth, Turkish identity or passport information and other identity information required for travel.

Contact data: telephone number, e-mail address and necessary contact information.

Booking and travel data: purchased tour, destination, travel dates, accommodation, transfers, flight information, special requests and booking records.

Financial and payment data: payment amount/date, bank/transfer information, invoice information and transaction records.

Communication records: booking and operational correspondence through e-mail, WhatsApp and other communication channels.

Riding and participation data: riding level, experience, Turkish Equestrian Federation licence information and other information required for participation.

Health data: medical reports requested for participation in extreme-sports/riding activities and related health information necessarily processed in this context.

Health data are special-category personal data under KVKK and are processed in accordance with statutory conditions.

3. PURPOSES OF PROCESSING PERSONAL DATA

Personal data may be processed for creating/managing bookings; establishing and performing tour/travel agreements; payment/accounting; communicating with Participants; planning tour operations; organizing accommodation, transfers and local services; notifying service providers of required reservations; arranging extreme-sports travel insurance; assessing safety and participation conditions for riding; checking licences/documents; fulfilling legal obligations; managing disputes and establishing, exercising or protecting rights; and responding to lawful requests from competent public authorities.

4. HEALTH DATA AND SPECIAL CATEGORIES OF PERSONAL DATA

Persons participating in riding, horseback safari, mountain/off-road riding, long-distance riding or extreme-sports activities may be asked for a medical report to verify that there is no health impediment and to complete relevant insurance procedures.

Medical reports and health information contained in them are protected as special-category personal data. They are processed only to the extent necessary for the relevant activity and on an appropriate legal basis under KVKK.

Where required, separate explicit consent may be requested for special-category data. Access to health data is limited to persons who need access by virtue of their duties and authority, and necessary technical/administrative safeguards are applied.

5. TRANSFER OF PERSONAL DATA

To the extent required for the service and in accordance with applicable legislation, personal data may be transferred to hotels/accommodation facilities; local tour operators; transfer/transport providers; riding facilities, horse farms and activity providers; insurance companies/intermediaries; payment/financial institutions; accountants/financial advisers; IT/infrastructure providers; legal advisers; and competent public authorities.

Transfers are limited to what is necessary to perform the service, fulfil legal obligations or achieve legitimate legal purposes.

6. INTERNATIONAL TOURS AND TRANSFER OF DATA ABROAD

For international tours, certain personal data may need to be transferred to hotels, local operators, transfer companies, riding facilities, insurers or other service providers in the relevant country to perform the booking and tour.

International transfers are carried out using an appropriate legal mechanism provided under the current KVKK rules on cross-border data transfers. Transferred data are limited to what is necessary to perform the service.

7. METHOD OF COLLECTING PERSONAL DATA

Personal data may be obtained physically or electronically through www.ride4culture.org, booking/application forms, e-mail, WhatsApp, telephone, social media, payment systems, bank transfers, face-to-face transactions, agreements, and submission of medical reports/licence documents.

8. LEGAL GROUNDS FOR PROCESSING PERSONAL DATA

Depending on the specific processing activity, personal data are processed on an appropriate legal ground under Article 5 of KVKK and, for special-category data, Article 6.

These grounds particularly include: direct necessity for establishment/performance of a contract; necessity for the data controller to fulfil a legal obligation; necessity for establishment, exercise or protection of a right; necessity for legitimate interests of the data controller provided fundamental rights/freedoms are not harmed; an appropriate Article 6 condition for special-category data; and, where required, explicit consent of the data subject.

9. WHATSAPP AND OTHER ELECTRONIC COMMUNICATION CHANNELS

Participants may be included in WhatsApp, e-mail or similar electronic channels to conduct tour organization. Participants should note that information such as name, surname, telephone number and profile information may become visible to other group participants.

FREE HORSES TRAVEL uses electronic communication groups for tour organization and operational communication.

10. RETENTION AND DELETION OF DATA

Personal data are retained for as long as necessary for the purpose of processing, taking statutory retention periods into account.

When the processing purpose and legal retention obligation end, personal data are deleted, destroyed or anonymized in accordance with applicable legislation.

11. DATA SECURITY

FREE HORSES TRAVEL applies technical and administrative measures appropriate to the nature of the data to prevent unlawful processing/access and ensure secure storage. Higher-security measures are applied to special-category personal data.

12. RIGHTS OF THE DATA SUBJECT

Under Article 11 of KVKK, data subjects may, subject to statutory conditions: learn whether their personal data are processed; request information if processed; learn the purpose of processing and whether data are used accordingly; learn third parties to whom data are transferred; request correction of incomplete/incorrect data; request deletion/destruction where conditions are met; request notification of correction/deletion/destruction to third parties receiving the data; exercise rights concerning analyses performed by automated systems under statutory conditions; and claim compensation for damage suffered due to unlawful processing.

13. APPLICATION

Requests under KVKK may be submitted to the data controller through the following contact channel:

Data Controller: [COMPANY'S OFFICIAL TRADE NAME] / FREE HORSES TRAVEL

TÜRSAB Certificate No: 10978

Address: [COMPANY ADDRESS]

KVKK E-mail Address: [KVKK E-MAIL ADDRESS]

Applications are evaluated and concluded within the procedures and periods prescribed by current KVKK legislation.

14. NATURE OF THIS PRIVACY NOTICE

This text is a privacy/information notice prepared under Article 10 of KVKK to inform data subjects about processing of their personal data.

Providing the notice or recording that it has been read does not, by itself, constitute explicit consent for processing activities requiring explicit consent.

Where processing activities require explicit consent, such consent is obtained separately and in accordance with applicable legislation.