

## **The Ritz-Carlton Residences, Istanbul COOKIE POLICY**

**Last updated on 28/03/2020**

**www.rcresidencesistanbul.com** website (“**Website**”) is operated Valikonagi Gayrimenkul ve Turizm Yatirimlari A.S. (hereinafter referred to as “**The Ritz Carlton Residences, Istanbul**”) as the data controller and VK108 uses some automatic data collecting technologies such as cookies, web beacons and pixel tags in order to process the personal data of users using the Website in line with the Turkish Personal Data Protection Law numbered 6698 (“**PDPL**”) and its relevant legislation.

This Cookie Policy only covers use of cookies of the Website and does not cover the request management by advertisers. The Website is in compliance with global regulations including the EU Cookies Directive. It is recommended for the Website users to use cookies when they visit the Website. VK108 may amend this Cookie Policy if and when it deems it as necessary. In case of any amendment of the Cookie Policy, such amendments shall become valid and applicable as of the date of revision stated at the top of this Policy. Therefore, it is advised that the Website users check the Cookie Policy and obtain information about use of cookies on the Website regularly.

### **Definitions**

“Cookies” are pieces of information that are stored on the user’s computer by the user’s web browser. When the user visits the Website, VK108’s server recognizes the cookies and provides information about the user’s last visit to the Website.

"Web beacons" (also known as transparent gifs or pixel tags) provides VK108 information about which contents are influential, helping VK108 to manage the Website contents better. Web beacon is placed in a page or e-mail to monitor the activity of users on the respective page or e-mail. Just like cookies, web beacons also send data to the server after monitoring the visit of any user. However; unlike cookies, beacons are not used for identification purposes, and they cannot store any data on the computer as they are not browser-based.

Unless IP addresses (or any such kind of other identifiers) are deemed as Personal Data under the local laws, all data collected by cookies or similar technologies shall be deemed as impersonal data.

### **Usage Purposes of the Cookies**

The main purposes in why VK108 collects personal data of the Website user is to understand the user’s behaviours, their web searches and seeing which parts of the Website they visit. Cookies are used to distinguish the Website user from other users, for them to have a pleasant experience while using the Website, and enable VK108 to improve the Website.

By visiting the Website, the user agrees to placement of cookies on their device that are necessary for use of the Website. If the user does not want the Website to place cookies on his/her device, he/she can block use of cookies from the browser settings or options. In such case, the Website user might not be able to properly use some of the functions of the Website.

The Ritz Carlton Residences, Istanbul uses all information obtained by using cookies in accordance with the Bilgili Holding Group Personal Data Policy and the The Ritz Carlton Residences, Istanbul’s clarification text in line with the PDPL and relevant legislation. (VK108 is part of Bilgili Holding Group. You may find a list of Bilgili Holding Group companies at <http://www.bilgiliholding.com/eng/bilgili-group-companies.html>)

### **Cookie Types used on the Website:**

- **Session Cookies:** They are temporary cookies that only last as long as the user uses the Website and are deleted once the user closes his/her browser.

- **Persistent Cookies:** They are used to increase the functionality of the Website and to offer faster and more efficient services to the users. Such cookies identifies the user's preferences and are stored on the user's devices by the browsers. With the use of persistent cookies, VK108 checks if there are cookies stored on the user's device when the user visits the Website next. If such answer is positive, these cookies determine the content that the user will access on the Website and thus offers the user enhanced services.

#### **The Website Uses 4 Types of Cookies which Contains Session and Persistent Cookies:**

- **Absolutely necessary cookies:** Such cookies enable users to surf on Website, anonymous cookies access secure areas using their features. Any information collected by these cookies may not be used for marketing purposes. If the user does not allow the use of such kind of cookies, he/she cannot utilize various sections of the Website.
- **Performance cookies:** These are anonymous cookies which help to improve the Website. Such cookies collect information about the usage of the Website by users and are used to determine the most frequently visited pages or received errors. Any information collected by such kind of cookies may not be used for marketing purposes, and are not disclosed to third parties.
- **Functionality Cookies:** These are anonymous cookies enabling the Website to remember the users' features and preferences. Based on such information, the Website show contents to each visitor in line with the information collected. If it is not allowed for use of such kind of cookies some sections of the Website may not be used, the level of support provided by the Website may be reduced and it might lead to the failure of the Website to remember the user's preferences or to use or show any feature specific to each user.
- **Target Cookies or Advertisement Cookies:** Such kind of cookies is generally placed by the advertising networks of the Website in line with the Website's information. These cookies are used to show related and customized advertisement, to limit the number of ads displayed, to measure the effectiveness of the advertising campaign and to remember the users' preferences.

#### **Amending or Rejecting the Usage of Cookies**

If the user rejects persistent cookies or session cookies, he/she can continue to utilize the Website but he/she may not be allowed to access or may have a limited access to functions of the Website.

The user may click on the following links to amend the usage of cookies:

- Adobe Analytics <http://www.adobe.com/uk/privacy/opt-out.html>
- AOL <https://help.aol.com/articles/restore-security-settings-and-enable-cookiesettings-on-browser>
- Google Adwords <https://support.google.com/ads/answer/2662922?hl=en>
- Google Analytics <https://tools.google.com/dlpage/gaoptout>
- Google Chrome <http://www.google.com/support/chrome/bin/answer.py?hl=en&answer=95647>
- Internet Explorer <https://support.microsoft.com/en-us/help/17442/windows-internet-explorerdelete-manage-cookies>
- MozillaFirefox <http://support.mozilla.com/en-US/kb/Cookies>
- Opera <http://www.opera.com/browser/tutorials/security/privacy/>

- Safari <https://support.apple.com/kb/ph19214?locale>