A V I C E N N A

H O M E S

Privacy Policy

ENGLISH | Draft for review - 13 October 2026

Publication note: This is a working draft. Bracketed fields and the editorial notes must be completed using the website’s actual data practices before publication.

1. Who is responsible for your information?

This policy explains how personal information is handled when you visit our website, contact us or book accommodation directly with Avicenna Homes.

Data controller: [INSERT REGISTERED LEGAL OPERATOR AND LEGAL FORM], trading as AVICENNA HOMES-KALKAN.

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Peri Hueck: +49 160 8439085
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Privacy enquiries: info@avicennahomes.com. [ADD ANY REQUIRED DATA PROTECTION CONTACT OR REPRESENTATIVE].

2. Information we collect and how we collect it

You provide information when you submit an enquiry or booking request, communicate with us or arrange your stay. This may include your name, email address, telephone number, stay dates, accommodation choice, guest numbers, information about accompanying adults, children and infants, and requested services.

We process booking confirmations, payment status and related correspondence to administer your reservation. [CONFIRM BILLING DATA, PAYMENT PROVIDER, AND WHETHER ANY CARD DATA IS RECEIVED OR STORED BY AVICENNA HOMES].

Where required by applicable guest-registration law, we collect necessary identity or registration information. [SPECIFY THE EXACT FIELDS, COLLECTION METHOD AND LEGAL REQUIREMENT].

When you use the website, technical information may be collected by its hosting and other services. [CONFIRM IP ADDRESSES, DEVICE/BROWSER DATA, SERVER LOGS, COOKIES AND OTHER TRACKING ACTUALLY USED]. If you give us information about other guests, please share this notice with them.

3. Why we use information and our legal grounds

We use enquiry and booking information to answer questions, check availability, take steps at your request before booking, administer reservations and payments, arrange confirmed services and communicate about your stay. The intended legal grounds are necessity for entering into or performing the accommodation contract, as applicable.

We process records necessary to meet applicable accounting, tax and guest-registration obligations on the basis of those legal obligations. Where lawful and necessary, we may process relevant records to handle complaints, protect website security and establish or defend legal claims on the basis of legitimate interests, subject to your rights.

Where consent is required for optional communications or tracking, it must be obtained separately and may be withdrawn. Accepting booking terms is not consent to marketing. [CONFIRM EACH PURPOSE AND ITS SPECIFIC GROUND UNDER TURKISH LAW NO. 6698 AND, WHERE APPLICABLE, THE GDPR].

4. Who receives information?

Information is made available only as necessary for the relevant purpose to authorised personnel and service providers supporting booking administration, hosting, communications, payment handling and professional advice, and to public authorities where disclosure is legally required.

[IDENTIFY ACTUAL PROVIDERS OR CLEAR RECIPIENT CATEGORIES, WHAT THEY RECEIVE AND WHY; CONFIRM ANY BOOKING PLATFORM, PAYMENT SERVICE, HOSTING COMPANY, EMAIL SERVICE, ANALYTICS TOOL AND EMBEDDED CONTENT].

5. International processing and transfers

Our accommodation operations are in Turkey. [IDENTIFY WHERE WEBSITE, BOOKING, PAYMENT AND EMAIL INFORMATION IS STORED OR ACCESSED, INCLUDING EACH RELEVANT COUNTRY].

[DESCRIBE ACTUAL INTERNATIONAL DATA FLOWS AND THE APPLICABLE LEGAL TRANSFER MECHANISM. WHERE REQUIRED, EXPLAIN HOW TO OBTAIN A COPY OF SAFEGUARDS. CONFIRM BOTH TURKISH TRANSFER RULES AND GDPR REQUIREMENTS WHERE APPLICABLE].

6. How long we keep information

Retention is determined by the purpose of collection, applicable legal recordkeeping requirements and the need to resolve complaints or claims. Information should be deleted or anonymised when it is no longer needed and no lawful retention requirement remains.

[INSERT VERIFIED PERIODS OR SPECIFIC CRITERIA FOR ENQUIRIES, BOOKINGS, PAYMENT/ACCOUNTING RECORDS, GUEST REGISTRATION, SERVER LOGS, CONSENT RECORDS AND ANY MARKETING DATA].

7. Cookies and optional website services

[INSERT THE VERIFIED COOKIE AND TRACKING INVENTORY: PROVIDER, NAME OR TYPE, PURPOSE, DURATION AND WHETHER CONSENT IS REQUIRED].

Where prior consent is legally required, optional cookies and similar technologies must remain inactive until that consent is given. [INSERT THE ACTUAL COOKIE SETTINGS LINK AND EXPLAIN HOW TO WITHDRAW CONSENT]. Browser settings may also allow you to block or delete cookies, which can affect website functions. Do not use this policy itself as a substitute for a working consent mechanism.

8. Security

[CONFIRM AND DESCRIBE THE ACTUAL ORGANISATIONAL AND TECHNICAL SAFEGUARDS IN GENERAL TERMS, INCLUDING ACCESS RESTRICTIONS AND SECURE TRANSFER/STORAGE]. No internet transmission or storage system can guarantee absolute security. Please avoid sending unnecessary sensitive information in an enquiry.

9. Your rights

Under applicable Turkish data protection law, you may request information about whether your data is processed, its use and recipients, correction of inaccurate data, and deletion or destruction where the legal conditions are met. You may also request notification of relevant corrections or deletions to recipients, object to an adverse result produced exclusively by automated analysis, and seek compensation for harm caused by unlawful processing, as provided by law.

Where the GDPR applies, you may also have rights of access, rectification, erasure, restriction, portability and objection, subject to the relevant conditions. You may withdraw consent without affecting the lawfulness of earlier consent-based processing. You may complain to the competent data protection authority, including the Turkish Personal Data Protection Authority or an EU supervisory authority where applicable.

Contact info@avicennahomes.com to make a request or obtain instructions for the applicable formal request procedure. We may need proportionate information to verify your identity and will handle requests within applicable statutory deadlines. [CONFIRM FORMAL KVKK REQUEST CHANNELS AND ANY REPRESENTATIVE CONTACT].

10. Required information and automated decisions

Information needed to identify your reservation, contact you and administer your stay is necessary to process a booking. Without it, we may be unable to confirm or provide the requested services. Optional information should be identified as optional when requested.

[CONFIRM WHETHER AUTOMATED DECISIONS WITH LEGAL OR SIMILARLY SIGNIFICANT EFFECTS OR PROFILING OCCUR; DESCRIBE THEM IF THEY DO, OR INSERT A VERIFIED STATEMENT THAT THEY DO NOT].

11. Updates

We may update this policy to reflect changes to our services or data practices. The published version will show its last-updated date. Material changes will be communicated as required by applicable law.

Editorial notes - remove before publication

The General Terms confirm booking administration, payment handling, guest communications and legal compliance, but do not identify the legal controller, suppliers, cookies, retention periods or international safeguards. The bracketed fields are deliberately unresolved.

Confirm the scope of Turkish law and any GDPR obligations, including whether an EU representative is required. Any additional Turkish collection-point notices or consents must be implemented where needed. Ensure the published wording describes the real website and booking process.

Review references: Turkish Personal Data Protection Authority, “Obligation to inform” (Article 10): https://www.kvkk.gov.tr/Icerik/6641/Obligation-to-inform

European Data Protection Board, “Respect individuals’ rights”: https://www.edpb.europa.eu/sme/be-compliant/respect-individuals-rights_en