

## **Personal data processing policy**

### 1. General Provisions

This personal data processing policy has been drawn up in accordance with the requirements of the Federal Law of July 27, 2006. No. 152-ФЗ "On Personal Data" (hereinafter referred to as the Personal Data Law) and determines the procedure for processing personal data and measures to ensure the security of personal data taken by hotels-info.com (hereinafter referred to as the Operator).

1.1. The operator sets as its most important goal and condition for the implementation of its activities the observance of human and civil rights and freedoms when processing their personal data, including the protection of the rights to privacy, personal and family secrets.

1.2. This Operator's policy regarding the processing of personal data (hereinafter referred to as the Policy) applies to all information that the Operator can obtain about visitors to the website <https://hotels-info.com>.

### 2. Basic concepts used in the Policy

2.1. Automated processing of personal data - processing of personal data using computer technology.

2.2. Blocking of personal data is a temporary suspension of the processing of personal data (unless the processing is necessary to clarify personal data).

2.3. Website - a set of graphic and information materials, as well as computer programs and databases, ensuring their availability on the Internet at the network address <https://hotels-info.com>.

2.4. Information system of personal data - a set of personal data contained in databases, and providing their processing of information technologies and technical means.

2.5. Depersonalization of personal data - actions as a result of which it is impossible to determine, without the use of additional information, the belonging of personal data to a specific User or other subject of personal data.

2.6. Processing of personal data - any action (operation) or a set of actions (operations) performed using automation tools or without using such tools with personal data, including collection, recording, systematization, accumulation, storage, clarification (update, change), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data.

2.7. Operator - a state body, municipal body, legal entity or individual, independently or jointly with other persons organizing and (or) carrying out the processing of personal data, as well as determining the purposes of processing personal data, the composition of personal data to be processed, actions (operations) performed with personal data.

2.8. Personal data - any information relating directly or indirectly to a specific or identifiable User of the website <https://hotels-info.com>.

2.9. Personal data permitted by the subject of personal data for dissemination - personal data, access of an unlimited number of persons to which is provided by the subject of personal data by giving consent to the processing of personal data permitted by the subject of personal data for dissemination in the manner prescribed by the Law on Personal Data (hereinafter - personal data permitted for distribution).

2.10. User - any visitor to the website <https://hotels-info.com>.

2.11. Provision of personal data - actions aimed at disclosing personal data to a certain person or a certain circle of persons.

2.12. Dissemination of personal data - any actions aimed at disclosing personal data to an indefinite circle of persons (transfer of personal data) or at acquaintance with the personal data of an unlimited number of

persons, including the disclosure of personal data in the media, posting on information and telecommunication networks or providing access to personal data in any other way.

2.13. Cross-border transfer of personal data - the transfer of personal data to the territory of a foreign state to the authority of a foreign state, to a foreign individual or foreign legal entity.

2.14. Destruction of personal data - any actions as a result of which personal data are destroyed irrevocably with the impossibility of further restoring the content of personal data in the personal data information system and (or) material carriers of personal data are destroyed.

### 3. Basic rights and obligations of the Operator

#### 3.1. The operator has the right:

- receive from the subject of personal data reliable information and/ or documents containing personal data;
- if the subject of personal data withdraws consent to the processing of personal data, the Operator has the right to continue processing personal data without the consent of the subject of personal data if there are grounds specified in the Law on Personal Data;
- independently determine the composition and list of measures necessary and sufficient for To ensure the fulfillment of the obligations provided for by the Law on Personal Data and regulatory legal acts adopted in accordance with it, unless otherwise provided by the Law on Personal Data or other federal laws.

#### 3.2. The operator is obliged:

- provide the subject of personal data, upon his request, with information regarding the processing of his personal data;
- organize the processing of personal data in the manner prescribed by the current legislation of the Russian Federation;
- respond to requests and inquiries from subjects of personal data and their legal representatives in accordance with the requirements of the Law on Personal Data;
- inform the authorized body for the protection of the rights of subjects of personal data at the request of this body the necessary information within 30 days from the date of receipt of such a request;
- publish or otherwise provide unrestricted access to this Policy in relation to the processing of personal data;
- take legal, organizational and technical measures to protect personal data from unauthorized or accidental access to them, destruction, alteration, blocking, copying, provision, distribution of personal data, as well as from other illegal actions in relation to personal data;
- stop the transfer (distribution, provision, access) of personal data, stop processing and destroy personal data in the manner and in cases provided for by the Law on Personal Data
- perform other duties provided for by the Law on Personal Data.

### 4. Basic rights and obligations of subjects of personal data

#### 4.1. Personal data subjects have the right to:

- to receive information regarding the processing of his personal data, with the exception of cases provided for by federal laws. The information is provided to the subject of personal data by the Operator in an accessible form, and it should not contain personal data relating to other subjects of personal data, unless there are legal grounds for disclosing such personal data. The list of information and the procedure for obtaining it is established by the Law on Personal Data;

- require the operator to clarify his personal data, block or destroy them if the personal data is incomplete, outdated, inaccurate, illegally obtained or not necessary for the stated purpose of processing, as well as take measures provided by law to protect their rights;
- put forward a condition of prior consent when processing personal data in order to promote goods, works and services on the market;
- to withdraw consent to the processing of personal data;
- to appeal to the authorized body for the protection of the rights of subjects of personal data or in court the illegal actions or inaction of the Operator when processing his personal data;
- to exercise other rights stipulated by the legislation of the Russian Federation.

4.2. Personal data subjects are obliged to:

- provide the Operator with reliable data about yourself;
- inform the Operator about the clarification (update, change) of their personal data.

4.3. Persons who have transferred false information about themselves to the Operator, or information about another subject of personal data without the consent of the latter, are liable in accordance with the legislation of the Russian Federation.

5. The operator can process the following personal data of the User

5.1. Full Name.

5.2. Email address.

5.3. Phone numbers.

5.4. Year, month, date and place of birth.

5.5. Also, the site collects and processes anonymized data about visitors (including cookies) using Internet statistics services (Yandex Metrica and Google Analytics and others).

5.6. The above data hereinafter in the text of the Policy are united by the general concept of Personal data.

5.7. The processing of special categories of personal data concerning race, nationality, political views, religious or philosophical beliefs, intimate life is not carried out by the Operator.

5.8. The processing of personal data permitted for distribution from among the special categories of personal data specified in Part 1 of Art. 10 of the Law on Personal Data is allowed if the prohibitions and conditions provided for in Art. 10.1 of the Law on Personal Data.

5.9. The User's consent to the processing of personal data permitted for distribution is drawn up separately from other consents to the processing of his personal data. In this case, the conditions provided for, in particular, Art. 10.1 of the Law on Personal Data. The requirements for the content of such consent are established by the authorized body for the protection of the rights of subjects of personal data.

5.9.1 The User provides the Operator directly with consent to the processing of personal data permitted for distribution.

5.9.2 The Operator is obliged, no later than three working days from the moment of receipt of the specified consent of the User, to publish information about the processing conditions, about the presence of prohibitions and conditions for the processing of personal data by an unlimited number of persons allowed for distribution.

5.9.3 The transfer (distribution, provision, access) of personal data permitted by the subject of personal data for distribution must be stopped at any time at the request of the subject of personal data. This requirement should include the last name, first name, patronymic (if any), contact information (phone

number, email address or postal address) of the subject of personal data, as well as a list of personal data, the processing of which must be terminated. The personal data specified in this requirement can be processed only by the Operator to whom it is sent.

5.9.4 Consent to the processing of personal data permitted for distribution is terminated from the moment the Operator receives the request specified in clause 5.9.3 of this Policy in relation to the processing of personal data.

## 6. Principles of processing personal data

6.1. The processing of personal data is carried out on a legal and fair basis.

6.2. The processing of personal data is limited to the achievement of specific, predetermined and legitimate purposes. Processing of personal data that is incompatible with the purposes of collecting personal data is not allowed.

6.3. It is not allowed to combine databases containing personal data, the processing of which is carried out for purposes incompatible with each other.

6.4. Only personal data that meet the purposes of their processing is subject to processing.

6.5. The content and volume of processed personal data correspond to the stated purposes of processing. The redundancy of the processed personal data in relation to the stated purposes of their processing is not allowed.

6.6. When processing personal data, the accuracy of personal data, their sufficiency, and, if necessary, relevance in relation to the purposes of processing personal data is ensured. The operator takes the necessary measures and / or ensures their adoption to remove or clarify incomplete or inaccurate data.

6.7. The storage of personal data is carried out in a form that makes it possible to determine the subject of personal data, no longer than the purpose of processing personal data requires, unless the storage period for personal data is established by federal law, an agreement to which the subject of personal data is a party, beneficiary or guarantor. The processed personal data is destroyed or depersonalized upon achievement of the processing goals or in case of loss of the need to achieve these goals, unless otherwise provided by federal law.

## 7. Purposes of personal data processing

7.1. The purpose of processing the User's personal data:

- informing the User by sending emails;
- conclusion, execution and termination of civil contracts;
- providing the User with access to services, information and / or materials contained on the website <https://hotels-info.com>.

7.2. The Operator also has the right to send the User notifications about new products and services, special offers and various events. The user can always refuse to receive informational messages by sending an email to the Operator at [info@hotels-info.com](mailto:info@hotels-info.com) with the note "Refusal of notifications about new products and services and special offers".

7.3. Anonymized data of Users collected using Internet statistics services are used to collect information about the actions of Users on the site, improve the quality of the site and its content.

## 8. Legal basis for the processing of personal data

8.1. The legal grounds for the processing of personal data by the Operator are:

- statutory (constituent) documents of the Operator;

- contracts concluded between the operator and the subject of personal data;
- federal laws, other regulations in the field of personal data protection;
- the consent of the Users to the processing of their personal data, to the processing of personal data permitted for distribution.

8.2. The Operator processes the User's personal data only if they are filled in and / or sent by the User independently through special forms located on the website <https://hotels-info.com> or sent to the Operator via e-mail. By filling out the appropriate forms and / or sending his personal data to the Operator, the User agrees with this Policy.

8.3. The Operator processes anonymized data about the User if it is allowed in the settings of the User's browser (the storage of cookies and the use of JavaScript technology are enabled).

8.4. The subject of personal data independently decides on the provision of his personal data and gives consent freely, of his own free will and in his interest.

## 9. Conditions for processing personal data

9.1. The processing of personal data is carried out with the consent of the subject of personal data to the processing of his personal data.

9.2. Personal data processing is necessary It is necessary to achieve the goals provided for by an international treaty of the Russian Federation or by law, for the implementation of the functions, powers and duties imposed by the legislation of the Russian Federation on the operator.

9.3. The processing of personal data is necessary for the administration of justice, the execution of a judicial act, an act of another body or official, subject to execution in accordance with the legislation of the Russian Federation on enforcement proceedings.

9.4. The processing of personal data is necessary for the execution of an agreement, to which the subject of personal data is a party or beneficiary or guarantor, as well as for concluding an agreement on the initiative of the subject of personal data or an agreement under which the subject of personal data will be the beneficiary or guarantor.

9.5. The processing of personal data is necessary to exercise the rights and legitimate interests of the operator or third parties or to achieve socially significant goals, provided that this does not violate the rights and freedoms of the subject of personal data.

9.6. The processing of personal data is carried out, access to an unlimited number of persons to which is provided by the subject of personal data or at his request (hereinafter - publicly available personal data).

9.7. The processing of personal data is carried out, subject to publication or mandatory disclosure in accordance with federal law.

## 10. The procedure for collecting, storing, transferring and other types of processing of personal data

The security of personal data processed by the Operator is ensured through the implementation of legal, organizational and technical measures necessary to fully comply with the requirements of the current legislation in the field of personal data protection.

10.1. The operator ensures the safety of personal data and takes all possible measures to exclude access to personal data of unauthorized persons.

10.2. The User's personal data will never, under any circumstances, be transferred to third parties, except for cases related to the implementation of current legislation or if the subject of personal data has given consent to the Operator to transfer data to a third party to fulfill obligations under a civil contract.

10.3. In the event of inaccuracies in personal data, the User can update them independently by sending a notification to the Operator at the Operator's e-mail address [info@hotels-info.com](mailto:info@hotels-info.com) marked "Updating personal data".

10.4. The period for processing personal data is determined by the achievement of the purposes for which the personal data were collected, unless another period is provided for by the contract or current legislation.

The user can at any time revoke his consent to the processing of personal data by sending a notification to the Operator via e-mail to the email address of the Operator [info@hotels-info.com](mailto:info@hotels-info.com) with the note "Revocation of consent to the processing of personal data".

10.5. All information that is collected by third-party services, including payment systems, communication facilities and other service providers, is stored and processed by the specified persons (Operators) in accordance with their User Agreement and Privacy Policy. The subject of personal data and / or the User is obliged to independently familiarize themselves with these documents in a timely manner. The operator is not responsible for the actions of third parties, including the service providers specified in this clause.

10.6. The prohibitions established by the subject of personal data on the transfer (except for providing access), as well as on the processing or processing conditions (except for gaining access) of personal data permitted for dissemination do not apply in cases of processing personal data in the state, public and other public interests determined by law RF.

10.7. When processing personal data, the operator ensures the confidentiality of personal data.

10.8. The operator stores personal data in a form that makes it possible to determine the subject of personal data no longer than the purpose of processing personal data requires, unless the storage period for personal data is established by federal law, an agreement to which the subject of personal data is a party, beneficiary or guarantor.

10.9. A condition for terminating the processing of personal data may be the achievement of the purposes of processing personal data, the expiration of the consent of the subject of personal data or withdrawal of consent by the subject of personal data, as well as the identification of illegal processing of personal data.

11. List of actions performed by the Operator with the received personal data

11.1. The operator collects, records, systematizes, accumulates, stores, clarifies (updates, changes), retrieves, uses, transfers (distribution, provision, access), depersonalization, blocking, deletion and destruction revival of personal data.

11.2. The operator carries out automated processing of personal data with the receipt and / or transmission of the information received via information and telecommunication networks or without it.

12. Cross-border transfer of personal data

12.1. Before starting the cross-border transfer of personal data, the operator is obliged to make sure that the foreign state, to whose territory it is supposed to transfer personal data, provides reliable protection of the rights of subjects of personal data.

12.2. Cross-border transfer of personal data on the territory of foreign states that do not meet the above requirements can be carried out only if the subject of personal data has consent in writing to the cross-border transfer of his personal data and / or the execution of an agreement to which the subject of personal data is a party.

13. Confidentiality of personal data

The operator and other persons who have gained access to personal data are obliged not to disclose to third parties and not to distribute personal data without the consent of the subject of personal data, unless otherwise provided by federal law.

#### 14. Final provisions

14.1. The user can receive any clarifications on issues of interest regarding the processing of his personal data by contacting the Operator via e-mail [info@hotels-info.com](mailto:info@hotels-info.com).

14.2. This document will reflect any changes in the personal data processing policy by the Operator. The policy is valid indefinitely until it is replaced by a new version.

14.3. The current version of the Policy is freely available on the Internet at <https://hotels-info.com>.