

**POSITION
PROCESSING AND PROTECTION OF PERSONAL DATA
CLIENTS BARVIKHA HOTEL & SPA**

I. General Provisions

1.1. The regulation on the processing and protection of personal data (hereinafter the “Regulation”) of Barvikha Hotel & Spa clients (hereinafter “Hotel”) determines the objectives, content and processing of personal data of Customers (hereinafter also referred to as “Personal Data Subjects”), measures aimed at personal data protection, as well as procedures aimed at identifying and preventing violations of the laws of the Russian Federation when working with personal data of Hotel Clients.

1.2. This Regulation was developed in accordance with the Federal Law of July 27, 2006 No. 152-ФЗ “On Personal Data” (hereinafter “the Federal Law “On Personal Data”), the Federal Law of July 27, 2006 No. 149-ФЗ “On Information, information technologies and information protection”, Decree of the Government of the Russian Federation dated November 1, 2012 No. 1119 “On approval of requirements for the protection of personal data when they are processed in personal data information systems”, other regulatory legal acts regulating the procedure of work with personal data.

1.3. The processing of personal data in the Representative Office is carried out in compliance with the principles and conditions stipulated by these Regulation and the legislation of the Russian Federation in the field of personal data.

1.4. The basic concepts used in the Regulations:

- Hotel – Barvikha Hotel & Spa, located at the Moscow Region, Rublyovo-Uspenskoe Highway, 114/3. The Hotel belongs to ZAO Premium Hotel Management (OGRN 1075032015673);
- Client – an individual-guest of the Hotel, customer of hotel services, consumer, subject of personal data;
- Hotel services – actions of the Hotel to accommodate Customers, as well as other activities related to accommodation, which includes basic and additional services provided to the Customer;
- Operator – a person who independently or jointly with other persons organizes and (or) performs the processing of personal data, as well as defining the goals of processing personal data, the composition of personal data to be processed, actions (operations) performed with personal data;
- Personal data – information stored in any format, related to an individual determined or to be determined on the basis of such information (a subject of personal data), which by itself or in combination with other information available to the Hotel allows the identification of the Client;
- Personal data processing – any action (operation) or a set of actions (operations) performed with the use of automation tools or without using such tools with personal data, including the collection, recording, systematization, accumulation, storage, refinement (update, change), retrieval, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data;
- Automated processing of personal data – processing of personal data using computer equipment;
- Personal Data Information System – a set of personal data contained in databases, as well as

information technologies and technical means enabling their processing;

- Provision of personal data - actions aimed at disclosing personal data to a specific person or a specific circle of persons;
- Cross-border transfer of personal data –transfer of personal data to the territory of a foreign state to the authority of a foreign state, a foreign individual or a foreign legal entity;
- Use of personal data – actions (operations) with personal data performed by the operator in order to make decisions or perform other actions that generate legal consequences in relation to the subject of personal data or other persons or otherwise affect the rights and freedoms of the subject of personal data or other persons.

2. *Purposes of processing Client's personal data*

2.1. Clients' personal data can be processed for the following purposes:

- hotel room reservations;
- formation and execution of the contract for the provision of services for accommodation or temporary accommodation in the Hotel;
- sending of information, advertising and other messages with the consent of the Hotel Client.

2.2. The operator is not allowed to process personal data that is incompatible with the specified objectives.

2.3. Personal data cannot be used for the purpose of causing property and moral harm to citizens, hindering the realization of the rights and freedoms of citizens.

3. *Content of the Client's personal data*

3.1. The volume and content of the personal data being processed strictly corresponds to the stated processing objectives and are not redundant in relation to the processing objectives.

3.2. The personal data of Clients collected, processed and stored by the Hotel includes:

- surname, name, patronymic (if any) of the Client;
- sex;
- day, month, year and place of birth;
- information on citizenship;
- type, series, number of the identity document, name of the authority that issued it, date of issue. Visa and other identification data contained in identity cards;
- credit or debit card number or other payment details;
- communication languages;
- address of registration and address of the actual place of residence;
- contact phone number;
- e-mail address.

3.3. When using the services of the Hotel's website, the Operator also processes other anonymized data that is automatically transmitted during the use of the website by means of the software installed on the computer of an individual (personal data subject):

- information about the browser used (or another program with which the site is accessed);
- IP address;
- cookie data.

3.4. Collection, recording, accumulation and refinement (updating, changing) of the Client's personal data is carried out by obtaining personal data directly from the Client or from a person authorized by the client to transfer them.

3.5. Hotel staff receive personal data with the written consent of the Client.

3.6. Hotel staff have the right to verify the accuracy and relevance of the personal data provided.

3.7. When using the reservation service, the following information is stored: the full name, telephone number and email address of the Customer, Customer's bank card number or other payment details. In order to provide a hotel service, this data is used for precise and one-off identification of a reservation when it is executed.

4. *Processing Client's personal data*

4.1. The processing of personal data of Clients for the fulfillment of goals shall imply the following possible actions: collection, storage, refinement, updating, modification, use, transfer, destruction.

4.2. Processing of personal data of Clients is carried out by using automated means of mechanical and manual methods.

4.3. Only those employees of the Hotel who are allowed to work with personal data of Clients and who have signed the Non-Disclosure Agreement for Personal Data may have access to the processing of personal data of Clients.

4.4. In order to fulfill the requirements of the current legislation of the Russian Federation in the field of migration policy, the Hotel transfers personal data of Clients to the branches of the migration service (FMS) in compliance with the personal data protection standards.

4.5. The Hotel does not transfer the personal data of the Clients to third parties without the consent of the personal data subject, unless otherwise provided by federal law.

4.6. Transboundary transfer of personal data shall not be conducted.

5. *Protection of personal data*

5.1. The Hotel respects the confidentiality of personal data, takes legal, organizational and technical measures to protect personal data from unauthorized or accidental access to them, destruction, modification, blocking, copying, distribution of personal data, as well as from other illegal actions.

5.2. The Hotel has notified the authorized body for the protection of the rights of subjects of personal data about the processing of personal data in accordance with the requirements established by the Federal Law "On Personal Data".

5.3. In case of detection of illegal actions with personal data, the operator, within a period not exceeding three working days from the date of such detection, is obliged to eliminate the violations. The operator is obliged to notify the subject of personal data about the elimination of the violations committed.

6. *Rights of the Client*

6.1. In order to ensure the protection of personal data stored at the Hotel, employees are entitled to:

- full information about their personal data and the processing of this data;
- free access to their personal data, including the right to receive copies of any record containing the employee's personal data, except as required by federal law;
- determination of their representatives to protect their personal data.

6.2. The Client has the right to demand the exclusion or correction of incorrect or incomplete personal data, as well as data processed in violation of the law. If the Hotel refuses to exclude or correct personal data, the Client has the right to declare in writing to the Hotel its disagreement with the appropriate reasoning for such disagreement.

6.3. The Client has the right to demand from the Hotel to notify all persons to whom the incorrect or incomplete personal data of the employee were previously sent about all exceptions, corrections or additions made to them.

6.4. The Client has the right to require the operator to clarify his personal data, to block or destroy it if personal data is incomplete, outdated, inaccurate, illegally obtained or not necessary for the stated purpose of processing, as well as to take measures provided by law to protect its rights.

6.5. If the Client considers that the operator processes his personal data in violation of the law or otherwise violates its rights and freedoms, the personal data subject has the right to appeal against the

operator's actions or omissions to the authorized body for the protection of personal data subjects or resort to court.

7. *Responsibility for violation of the rules governing the Clients' personal data processing*

7.1. The Hotel is responsible for the personal data that is at its disposal and establishes the personal responsibility of staff for compliance with the established confidentiality regime.

7.2. Each employee who receives a document containing the personal data of the Client for work is solely responsible for the safety of the media and confidentiality of information.

7.3. Hotel employees are obliged to ensure the consideration of requests, applications and complaints of Clients at the proper level, as well as facilitate the execution of the requirements of the competent authorities.

7.4. Persons guilty of violating the rules governing the receipt, processing and protection of the Clients' personal data are subject to disciplinary, administrative, civil or criminal liability in accordance with federal law.

8. *Prevailing language*

8.1. The present Regulation is made in Russian and English. Should any discrepancy be revealed between the Russian and English texts hereof, the Russian text shall prevail.