

Personal Data processing policy of the website users by

Limited Liability Company Slavyanskaya Hotel and Business Center

1.General Provisions

The following personal data processing policy is composed in accordance with the requirements of the Federal Law of July 27, 2006. No. 152-FZ "On Personal Data" (with amendments and additions) and determines the procedure of processing personal data and measures undertaken by Limited Liability Company Slavyanskaya Hotel and Business Center (hereinafter referred to as the Operator) to ensure the security of personal data.

1.1.The condition and purpose of the Operator's activities is to procure the protection of a person's rights and liberties while processing his/her personal data, including the right to privacy, personal and family secrecy.

1.2. The Operator's policy regarding personal data processing (hereinafter referred to as the Policy) applies to all the information the Operator receives about visitors and users of the Operator's websites.

1.3.In accordance with the Federal Law of the Russian Federation "On Personal Data" No. 152-FZ (hereinafter referred to as the Law on Personal Data), the Operator collects, records, systematizes, accumulates, stores and updates (corrects and changes), and also extracts personal data of Russian citizens using databases located on the territory of the Russian Federation. If you indicate that you are a citizen of the Russian Federation, the Operator will process your personal data in accordance with this requirement, and your profile will be stored in databases in the Russian Federation. If you do not indicate that you are a citizen of the Russian Federation, the Operator will not be able to process and store your personal data in accordance with these requirements and will not hold any responsibility. You are solely responsible for specifying your country of citizenship. Information containing personal data of citizens of the Russian Federation may be transferred from the Russian Federation to countries that provide an appropriate level of personal data protection, including countries of the European Union and other countries that provide an appropriate level of data protection in accordance with Russian law. By providing the Operator with information about yourself on the Operator's websites and in the Operator's applications, by sending forms to the Operator or registering on the Operator's websites, in the Operator's programs and applications, and by making a reservation, you consent to the processing of your personal data by the Operator.

1.4. The policy regarding the processing of personal data in cases not specified in this Policy is governed by the Radisson Hotel Group Privacy Policy (also published on the Operator's websites), insofar as it does not contradict the legislation of the Russian Federation.

1.5. The policy applies to personal data that the Operator may receive about the user during the use of the Operator's websites, as well as its subdomains, its programs and products, with or without automation tools.

1.6. The Policy applies to relations in terms of personal data processing that the Operator has both before and after the approval of this Policy.

1.7. This Policy is applicable only on the websites of the Operator, the Operator does not control and does not hold responsibility for the websites and mobile applications of the third parties to which the user can be redirected by clicking on the links available on the website of the Operator.

1.8. The Operator does not verify the accuracy of personal data provided by users and does not control their legal capacity, except when such verification is necessary in order to fulfill obligations to the user. The Operator assumes that the user provides reliable and sufficient personal information.

1.9. The materials posted on the websites of the Operator - the results of intellectual activity and / or means of individualization (intellectual property), including but not limited to: trademarks, trade names, service marks, logos, text, graphics, images, photographs, illustrations, are the property of the Operator or used by it under a license, and are subject to protection as intellectual

property. It is strictly prohibited to decompile, copy, reproduce, modify, supplement or otherwise use the content of the Operator's websites without the Operator's permission

2. Basic definitions used in the Policy

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

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

2.3. Websites of the Operator:

- a set of graphic and information materials, as well as computer programs and databases that ensure their availability on the Internet at network addresses:

<https://slavyanskaya-moscow.ru/>

<https://www.radissonhotels.com/ru-ru/hotels/radisson-moscow-slavyanskaya>

<https://radissonslavyanskaya.2roomz.com/>

- a set of interconnected web pages hosted on the Internet at the unique addresses of the Operator's websites, as well as its subdomains;

- Subdomains are pages or a set of pages located on third-level domains belonging to the Operator's websites, as well as other temporary pages, at the bottom of which the Company's contact information is indicated;

- Cookies - a piece of data sent by a web server and stored on the user's computer, which the web client or web browser sends to the web server each time in an HTTP request when trying to open a page of the corresponding website;

- IP address - a unique network address in a computer network through which the User accesses the website.

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

2.5. Depersonalization of personal data - actions as a result of which it is impossible to determine, without the use of additional information, the ownership of personal data by 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 with or without the use of automation tools with personal data, including collection, recording, systematization, accumulation, storage, clarification (updating, changing), extraction, use, transfer (distribution, provision, access), including cross-border data transfer, depersonalization, blocking, removal, destruction of personal data;

2.7. The Operator - Limited Liability Company Slavyanskaya Hotel and Business Center (TIN 7730001183) that independently or collectively with other parties organizes and (or) processes personal data, as well as determines 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 hotel websites.

2.9. User - any person who has access to the hotel's websites via the Internet, the subject whose personal data are processed by the Operator.

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

2.11. Distribution of personal data - any actions aimed at disclosing personal data to an indefinite circle of persons (transfer of personal data) or familiarizing with personal data an unlimited number of persons, including the disclosure of personal data in the media, placement in information and telecommunication networks or providing access to personal data in any other way.

2.12. Cross-border transfer of personal data - transfer in accordance with the established procedure of personal data to the territory of a foreign state to an authority of a foreign state, a foreign individual or foreign legal entity.

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

2.14. Basic terms and definitions:

- Automated system (AS) - a system consisting of personnel and a set of means for automating its activities, implementing information technology for performing established functions;
- Administrator of the AS (system administrator of the AS) - a person responsible for the functioning of the AS in the established mode of operation;
- Information - information about persons, objects, facts, events, phenomena and processes, regardless of the form of their presentation;
- Information resources - individual documents and individual arrays of documents, documents and arrays of documents in information systems: libraries, archives, funds, data banks, other types of information systems;
- Information system - a set of information contained in databases and information technologies and technical means that ensure its processing;
- Information of a confidential nature (confidential information) - information without free access on a legal basis and in relation to which a confidentiality regime has been established;
- Confidentiality of information - a mandatory requirement for a person who has access to certain information not to transfer such information to third parties without the consent of its owner;
- Local area network (LAN) - a set of basic technical means and systems that exchange information between themselves and with other information systems, including LAN, through certain points of entry / exit of information, which are the border of the LAN;
- Unauthorized access (UA) to information (information resources, IR) - access to information (information system resources), carried out in violation of the established rights and (or) rules of access to information (IR) using standard IR tools or tools similar to them in their functional purpose and technical characteristics;
- Official information of limited distribution - information, access to which is limited by public authorities in accordance with the Civil Code of the Russian Federation and federal laws (official secret);

3. Purposes of personal data processing

3.1. The purpose of processing the User's personal data is the conclusion, execution and termination of civil law contracts; granting access to the User to the services, information and/or materials contained on the Operator's websites, as well as concretization (clarification of details) of the relationship with the User.

3.2. The Operator also has the right to send notifications to the User about new products and services, special offers and various events. The User can always refuse to receive information messages by sending an email to the Operator at secretariat@rdmos.ru with the subject "Refusal of notifications about new products and services and special offers".

3.3. Non-personal data of Users, collected with the help of Internet statistics services, serve to collect information about the actions of Users on websites, improve the quality of the website and its content.

4. Legal grounds for the processing of personal data

4.1. The legal basis for the processing of personal data is a set of legal acts, in pursuance of which and in accordance with which the operator processes personal data.

- federal laws and normative legal acts adopted on their basis, regulating relations related to the activities of the operator;
- agreements concluded between the operator and the subject of personal data;
- consent to the processing of personal data (in cases not expressly provided for by the legislation of the Russian Federation, but corresponding to the authority of the operator).

4.2. 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 Operator's websites. By filling in the relevant forms and / or sending their personal data to the Operator, the User expresses his/her consent to the Policy.

4.3. The Operator processes anonymous data about the User if it is allowed in the User's browser settings (saving cookies and using JavaScript technology is enabled).

5. The procedure of collecting, storing, transferring and other types of processing of personal data

5.1. The operator has the right to:

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

5.2. The operator is obliged to:

- organize the processing of personal data in accordance with the requirements of the Law on Personal Data;
- respond to requests and requests from the User of personal data and their legal representatives in accordance with the requirements of the Law on Personal Data;
- report to the authorized party for the protection of the rights of personal data subjects (the Federal Service for Supervision of Communications, Information Technology and Mass Communications (Roskomnadzor)) at the request of this party the necessary information within 30 days from the date of receipt of such a request.

5.3. Basic rights of the User.

The user has the right to:

- receive information regarding the processing of his personal data, except as otherwise provided by federal laws. The information is provided to the User 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 legal measures to protect their rights;
- offer a condition of prior consent when processing personal data in order to promote goods, works and services on the market;
- appeal to Roskomnadzor or in court against illegal actions or inaction of the Operator when processing his personal data.

5.4. User Responsibilities:

The use by the user of the Operator's websites and the user's ticking on the consent box to the Policy means the user's consent to the processing of his personal data specified in the Policy, with the Policy and the conditions for processing the user's personal data specified therein. In case of disagreement with these conditions, the user must refrain from using (stop using) the Operator's website. By continuing to work on the Operator's websites, the user - the subject of personal data - expresses his/her consent to the Operator for the processing of the user's personal data.

5.5. 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 legislation of the Russian Federation in the field of personal data protection. The operator takes the necessary legal, organizational and technical measures to

protect personal data from unauthorized or accidental access to them, destruction, modification, blocking, distribution and other unauthorized actions, including:

- determines threats to the security of personal data during their processing;
- adopts local regulations and other documents regulating relations in the field of processing and protection of personal data;
- appoints persons responsible for ensuring the security of personal data;
- creates the necessary conditions for working with personal data;
- organizes work with information systems in which personal data is processed;
- stores personal data under conditions that ensure their safety and exclude unauthorized access to them;
- organizes training for the Operator's employees who process personal data.

5.6. The Operator stores personal data in a form that allows identifying the Personal Data Subject for no longer than is required by the purposes of processing personal data (until the personal data subject responds to a request), if the personal data storage period is not established by federal law, contract.

5.7. The Operator ensures the safety of personal data and takes all possible measures to prevent access to personal data of unauthorized persons.

5.8. The User's personal data will never, under any circumstances, be transferred to third parties, except in cases related to the implementation of the legislation of the Russian Federation and this Policy.

5.9. In case of detection of inaccuracies in personal data, the User can update them independently by sending a notification to the Operator to the Operator's email address secretariat@rdmos.ru with subject "Updating personal data".

5.10. The term for processing personal data is unlimited. The User may at any time withdraw his consent to the processing of personal data by sending the Operator a notification by e-mail to the Operator's email address secretariat@rdmos.ru with subject "Withdrawal of consent to the processing of personal data".

5.11. In case of confirmation of the fact of inaccuracy of personal data or the illegality of their processing, personal data is subject to updating by the Operator or terminating, respectively.

5.12. Upon reaching the goals of processing personal data, as well as in the event that the subject of personal data withdraws consent to their processing, personal data shall be destroyed in the prescribed manner if:

- otherwise is not provided by the agreement to which the subject of personal data is a party, beneficiary or guarantor;
- The Operator is not entitled to process without the consent of the subject of personal data on the grounds provided for by the Federal Law "On Personal Data" or other federal laws;
- otherwise is not provided by another agreement between the operator and the subject of personal data. The Operator is obliged to inform the subject of personal data or his/her representative about the processing of personal data of such subject, carried out by it at the request of the latter.

5.13. The processing of personal data is carried out exclusively by obtaining personal data directly from the Subjects of personal data on the websites of the Operator.

5.14. When processing personal data, the Operator processes them using databases located on the territory of the Russian Federation, the Operator fully complies with the requirements of the legislation of the Russian Federation on the localization of personal data on the territory of the Russian Federation.

6. Cross-border transfer of personal data

6.1. Before the start of the cross-border transfer of personal data, the operator is obliged to make sure that the foreign state to whose territory the transfer of personal data is supposed to be carried out provides reliable protection of the rights of subjects of personal data.

6.2. 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 there is a written consent of the subject of personal data to the cross-border transfer of his/her personal data and / or execution of an agreement to which the subject of personal data is a party.

6.3. The policy regarding the processing of personal data during their cross-border transfer is also posted on the Operator's websites as a separate document.

7. Final provisions

7.1. The User can obtain clarifications on issues of interest regarding the processing of his personal data by contacting the Operator via e-mail secretariat@rdmos.ru.

7.2. The policy is valid indefinitely until it is replaced by a new version.

7.3. The Operator has the right to unilaterally extrajudicially at any time, at its sole discretion, make changes and additions to the Policy.

7.4. In pursuance of the requirements of the Law on Personal Data, this Policy is published in the public domain on the Internet information and telecommunications network. This Policy is an open and public document. The current version of the Policy is posted on the Operator's websites. The Operator has the right to make changes to the Policy. When changes are made to the Policy, the Operator notifies users of this by posting a new version of the Policy on the Operator's websites. Continued use of the Operator's website after making changes and / or additions to the Policy means the user's consent to such changes and / or additions, in connection with which the user undertakes to regularly monitor changes to the Policy on the Operator's websites.

7.5. All suggestions, feedback, complaints regarding the processing of personal data can be sent to the Operator's email address (e-mail) secretariat@rdmos.ru