**PERSONAL DATA PROCESSING POLICY**

**1. General provisions**

1.1. This document defines the policy of the Limited Liability Company- "SOTY" Management Company (hereinafter referred to as the Hotel, Operator, TIN 6659127835) about processing and ensuring the security personal data (hereinafter referred to as the Policy).

1.2. This Policy is developed to implement the requirements of the Legislation of the Russian Federation. Obligations in the field of processing and ensuring the security of personal data. It is aimed at fully ensuring the protection of human rights and freedoms, age, and citizen when processing their personal data in the Hotel.

1.3. The provisions of this Policy are binding for the following purposes: all employees of the Hotel are required to do so.

1.4. The provisions of this Policy are the basis for the organization of all processes in the Hotel related to the processing and protection of personal data.

1.5. This Policy has been developed by the federal legislation of the Russian Federation.

\* The Constitution of the Russian Federation;

\* Federal Law No. 152-FZ of 27.07.2006 "On Personal Data";

\* Federal Law No. 132-FZ of 24.11.1996 "On the basics of tourist activities in the Russian Federation";

\* "Rules for providing hotel services in the Russian Federation", approved by Decree of the Government of the Russian Federation No. 1853 of 18.11.2020;

\* As well as by other applicable federal laws and regulations of the Russian Federation that define the rules and regulations for features of personal data processing and security assurance and confidentiality of such processing.

1.6. This Policy sets out:

\* purposes of personal data processing;

\* general principles and rules of personal data processing;

\* classification of personal data and subjects of personal data;

\* rights and obligations of the Subjects of personal data and the Hotel about their use processing;

\* The procedure for organizing the processing of personal data.

1.7. This Policy is subject to posting on a public resource on the official website of the Hotel https://ekaterinburg-hotel.ru/in unlimited access.

1.8. This Policy comes into force from the moment of its approval or posting on the Hotel's website.

1.9. This Policy is subject to revision by the Hotel unilaterally due to changes in the legislation of the Russian Federation in the field of processing and protection of personal data, based on the results of the assessment of the punctuality, sufficiency, and effectiveness of the measures taken to ensure the security of personal data processing in the Hotel.

1.10.The Hotel reserves the right to make changes unilaterally to this Policy, provided that the changes do not contradict the current legislation of the Russian Federation. The updated Policy comes into force after its approval or posting on the Hotel's website.

1.11. This Policy applies to actions (operations) 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, modification), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data.

**2. Basic terms and definitions**

SOTY Management Company LLC (hereinafter referred to as the "Ekaterinburg" Congress Hotel, Hotel, Operator) -the personal data operator Independently or jointly with other persons organizes and (or) processes personal data, and also determines the purposes of personal data processing, the composition of personal data to be processed, actions (operations) performed with personal data

Hotel - "Ekaterinburg" Congress Hotel is a property complex designed to provide hotel and related services for guests (restaurants, conferences, events, etc.).

A guest is an individual, a consumer of hotel services, and one of the Subjects of personal data.

Hotel services - a set of services for providing temporary accommodation in a hotel, including related services, the list of which is determined by the Hotel.

Automated processing of personal data is the processing of personal data using computer technology.

Biometric personal data is information that characterizes the physiological and biological characteristics of a person, based on which it is possible to establish his identity and which is used by the Operator to establish the identity of the Subject of personal data.

Blocking of personal data is a temporary termination of the processing of personal data (except in cases where processing is necessary to clarify personal data).

Personal data security is a state of personal data security characterized by the ability of users, technical means, and information technologies to ensure the confidentiality, integrity, and availability of personal data when they are processed in personal data information systems.

Personal data information system — a set of personal data contained in databases and information technologies and technical means that ensure their processing.

Confidentiality of personal data is a mandatory requirement for the Hotel or other persons who have access to personal data to prevent their disclosure and dissemination without the consent of the personal data subject or the presence of other legal grounds.

Processing of personal data — any action (operation) or combination of actions (operations) performed with or without the use of automated means with personal data, including collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data.

Publicly available personal data — personal data to which an unlimited number of persons have access with the consent of the Subject of personal data or to which, by federal laws, the requirement of confidentiality is not applied.

Depersonalization of personal data — actions, as a result of which it becomes impossible to determine the identity of personal data to a specific Subject of personal data without the use of additional information.

Provision of personal data — actions aimed at disclosure of personal data to a certain person or a certain circle.

Personal data — any information relating to a directly or indirectly defined or identifiable individual (Subject of Personal Data).

Special categories of personal data — personal data concerning race, nationality, political views, religious or philosophical beliefs, health status, and intimate life of the Subject of personal data.

The subject of personal data is an individual who is directly or indirectly identified or determined using data. Other information is data that cannot be used to identify a physical person or that is not directly related to him.

Destruction of personal data — actions as a result of which it becomes impossible to restore the content of personal data in the information system of personal data and (or) as a result of which the material carriers of personal data are destroyed.

**3. Purposes of personal data processing**

3.1. The Hotel processes personal data for:

\* provision of hotel and /or additional services in the “Ekaterinburg” Congress Hotel by the Rules for the Provision of Hotel Services, the civil legislation of the Russian Federation, and the category assigned to the Hotel;

\* providing the Subject of personal data with confirmation of booking a room/rooms at the “Ekaterinburg” Congress Hotel;

\* conclusion of contracts with the Subject of personal data for provision of hotel and additional services in the “Ekaterinburg” Congress Hotel and their further execution;

\* formation of statistical reports, including for submission to the controlling state authorities of the Russian Federation;

\* providing the Subject of personal data with information about the services provided, current marketing promotions, and new services;

\* processing incoming requests from individuals to provide advice;

\* analytics of an individual's actions on the website;

\* transfer of data to third parties to comply with the migration legislation of the Russian Federation;

\*as well as for other purposes that are not prohibited by the federal law, legislation, and international treaties of the Russian Federation.

1. **Classification of personal data and categories of Subjects, personal data that are processed at the Hotel**

4.1.Personal data includes any information related directly or indirectly to a specific or identifiable individual (Subject of personal data) processed by the Hotel for the achievement of the specified purposes, including, but not limited to the following personal data:

\* last name, first name, patronymic (if any);

\* date, month, and year of birth, place of birth;

\* gender;

\* passport details; or any other identity document;

\* for foreign citizens - visa data, migration card, residence permit, or temporary residence permit;

\* citizenship;

\* registration address, including temporary registration;

\* address of the place of residence or places of stay;

\* Contact phone number;

\* email address.

4.2.The Hotel does not process special categories of personal data concerning race, nationality, political views, religious and philosophical beliefs unless otherwise established by the legislation of the Russian Federation.

4.3. The hotel processes personal data of the following categories of Personal Data Subjects:

\* individuals who perform work and provide services under civil law contracts concluded with the Hotel;

\* individuals who are Hotel guests and/or legally represent the interests of Hotel guests, or intend to become such;

\* individuals who purchase or intend to purchase the services of third parties through the intermediary of the Hotel, provided that their personal data is included in the automated systems of Hotels in connection with the provision of hotel and/or additional services by the Hotel;

\*other individuals who have expressed consent to the processing of their personal data by the Hotel or the processing of whose personal data is necessary for the Hotel to perform duties, perform functions or powers assigned and/or provided for by the international agreement of the Russian Federation or the law of the Russian Federation.

**5. Basic principles of personal data processing**

5.1. The processing of personal data in the Hotel is carried out based on the following principles:

\* legality of the purposes and methods of personal data processing;

\*compliance of the purposes of personal data processing with the purposes previously defined and declared when collecting personal data;

\* compliance with the composition and volume of processed personal data, as well as methods of processing personal data with the stated processing purposes;

\* reliability of personal data, their sufficiency for processing purposes;

\* inadmissibility of processing personal data that is excessive to the purposes stated when collecting personal data;

\* inadmissibility of combining databases containing personal data, the processing of which is carried out for purposes incompatible with each other;

\* ensuring the storage of personal data for no longer than the purposes of personal data processing required, unless the period of storage of personal data is established by federal law, an agreement, the party to which is the Subject of personal data;

\* storage of personal data in a form that allows to identify the subject of personal data;

\* ensuring the accounting and storage of personal data, excluding theft, substitution, unauthorized copying and destruction;

\* storage of personal data recorded on paper, according to the normative legal acts of the Russian Federation in the field of archival affairs and archival storage;

\* destruction or depersonalization of personal data upon the achievement of the processing goals or in case of loss of the need to achieve these goals, unless otherwise provided by the legislation of the Russian Federation, the contract to which the Subject of personal data is a party;

\* ensuring the confidentiality and security of the processed personal data.

**6. Organization of personal data processing**

6.1. The processing of personal data is carried out in compliance with the principles and rules established by Federal Law No. 152-FZ of 27.07.2006 "On Personal Data".

6.2. The hotel processes personal data, both with the use of automation tools and without the use of automation tools.

6.3. The Hotel may include the personal data of the subjects in publicly available sources of personal data, while the Hotel takes the written consent of the subject to the processing of his personal data.

6.4. Biometric personal data is not processed at the Hotel.

6.5. The Hotel may carry out a cross-border transfer of personal data (both to countries that provide an appropriate level of personal data protection, and to other countries that may not provide an appropriate level of personal data protection) to fulfill the contract to which the Subject of Personal data is a party, and/or with his consent.

6.6.Decision-making based solely on automated processing of personal data that generate legal consequences to the Subject of personal data or otherwise affects his rights and legitimate interests is not carried out.

6.7. In the absence of the need for the Subject's written consent to the processing of his personal data, the Subject's consent may be given by the Subject of personal data or his representative in any form that allows obtaining the fact of its receipt.

6.8. The Hotel has the right to entrust the processing of personal data to another person with the consent of the Personal Data Subject unless otherwise provided by federal law, based on an agreement concluded with this person (hereinafter referred to as the Operator's order). At the same time, the Hotel in the contract obliges the person processing personal data on behalf of the Hotel to comply with the principles and rules of personal data processing provided for by this Federal Law.

6.9. Access to the personal data processed by the Hotel is granted to state authorities (including regulatory, supervisory, law enforcement, and other bodies) in the scope and manner established by the relevant legislation of the Russian Federation.

6.10. Collection and processing of Other information.

For this Policy, "Other Information" means data that does not directly identify a visitor to the Hotel's website https://ekaterinburg-hotel.ru /, but is used by the Hotel with his consent. These data represent fragments of information that are used by the server to exchange status data with the Internet user's browser, in particular, this is information about the browser and device used by the visitor (the Subject of personal data) of the site, the history of site visits and the pages viewed. The collection of such information is carried out by the Hotel using cookies, pixel tags ("dot markers"), and other similar technologies. Such information is used by the Hotel to conduct web analysis and collect statistical data, track the flow of visitors and evaluate their way of working with the site, optimize the work with the site for the visitor, exchange data with third-party websites, and redirect users to the Hotel website. Since other information does not personally identify the visitor, it can be disclosed and used for any non-prohibited purposes. In some cases (for example, when subscribing to the website of the user through the feedback form) The hotel can use other information in combination with the personal data of the visitor of the site. In such cases, such data will be considered personal by this Policy.

**7. Rights of the personal data Subject**

7.1. The personal data subject has the right to:

\* to receive information concerning the processing of his personal data in the manner, form, and terms established by the Legislation on Personal Data;

\* to demand clarification of their personal data, their Blocking or Destruction if the personal data are incomplete, outdated, unreliable, illegally obtained, are not necessary for the stated purpose of processing, or are used for purposes not previously stated when the Subject of personal data provided consent to the processing of personal data;

\* take legal measures to protect their rights;

\* withdraw your consent to the processing of personal data.

7.2.The subject of personal data is obliged to provide complete, accurate, and reliable information about his personal data.

7.3. The right of a personal data subject to access his/her personal data may be restricted by federal laws.

**8. Rights and obligations of the Hotel when processing personal data**

8.1. The Hotel has the right to:

\* process the personal data of the Personal Data Subject by the stated purpose;

\* require the Subject of personal data to provide reliable personal data necessary for the performance of the contract, the provision of services;

\* Identification of the Subject of personal data, as well as in other cases provided for by the Legislation on personal data;

\*restrict the access of the Personal Data Subject to his personal data if such violates the rights and legitimate interests of third parties, as well as in other cases provided for by the legislation of the Russian Federation;

\*process publicly available personal data of individuals;

\* to process personal data subject to publication or mandatory disclosure by the legislation of the Russian Federation;

\* clarify the processed personal data, block or delete if the personal data is incomplete, outdated, inaccurate, illegally obtained, or is not necessary for the stated purpose of processing;

\* keep records of requests from personal data Subjects;

\*entrust the processing of personal data to another person with the consent of the Personal Data Subject.

8.2. By the requirements of the Federal Law "On Personal Data", the Hotel is obliged to:

\* To provide the Subject of personal data, upon his request, with information concerning the processing of his personal data, or on legitimate grounds to provide a refusal;

\*at the request of the Personal Data Subject, clarify the processed personal data, block or delete if the personal data are incomplete, outdated, inaccurate, illegally obtained, or are not necessary for the stated purpose of processing;

\* keep records of requests from personal data Subjects;

\* notify the Subject of personal data about the processing of personal data if the personal data was not received from the Subject of personal data, except in cases provided for by the law of the Russian Federation;

\* if the purpose of personal data processing is achieved, it is necessary to terminate the processing of personal data and destroy the relevant personal data, unless otherwise provided by the agreement to which the Personal Data Subject is a party and by an agreement between the Hotel and the Personal Data Subject;

\*if the Subject of personal data withdraws consent to the processing of their personal data, stop processing personal data and destroy personal data within the time limit established by the legislation of the Russian Federation;

\* The Hotel undertakes and obliges other persons who have gained access to personal data not to disclose them to third parties and not to distribute personal data without the consent of the Subject of personal data unless otherwise provided by federal law;

\*appoint the person(s) responsible for organizing the processing of personal data.

**9. Measures to ensure the security of personal data during their processing**

9.1.When processing personal data, the Hotel takes the necessary legal, organizational, and technical measures to protect personal data from unauthorized or accidental access to them, destruction, modification, blocking, copying, provision, dissemination of personal data, as well as from other illegal actions about personal data.

9.2. Ensuring the security of personal data is achieved, in particular by:

\* Identification of threats to the security of personal data during their processing in personal data information systems;

\* the application of organizational and technical measures to ensure the security of personal data during their processing in the information systems of personal data necessary to meet the requirements for the protection of personal data, the implementation of which ensures the levels of personal data protection established by the Government of the Russian Federation;

\*assessment of the effectiveness of measures taken to ensure the security of personal data before the commissioning of the personal data information system;

\* taking into account machine-generated personal data carriers;

\* detection of unauthorized access to personal data and taking measures;

\* recovery of personal data modified or destroyed due to unauthorized access to them;

\* establishing rules for access to personal data processed in the personal data information system, as well as ensuring registration and accounting of all actions performed with personal data in the personal data information system;

\* training of the Hotel staff involved in the processing of personal data on the issues of ensuring the security of personal data;

\* control over the measures taken to ensure the security of personal data and the level of security of personal data information systems.

**10. Responsibility of the Hotel**

10.1. Control over the implementation of the requirements of this Policy, rules, and requirements applicable to the processing of personal data in the Hotel is carried out by persons appointed by the Order of the executive body of the Hotel.

10.2. The Hotel, as well as its officials and employees, bear criminal, civil, administrative, and disciplinary responsibility for non-compliance with the principles and conditions of personal data processing, as well as for disclosure or illegal use of personal data by the legislation of the Russian Federation.