

Personal Data Processing Policy

1. General provisions

1.1. This Personal Data Processing Policy (hereinafter referred to as the Policy) at the Okhotnik Hotel (All — Russian Association of Public Associations of Hunters and Fishermen "Rosokhotrybolovsoyuz Association", TIN: 7712008965, OGRN: 1027739698447, hereinafter referred to as the Hotel) defines the purposes, content and procedure for processing personal data, measures aimed at protecting personal data, as well as procedures aimed at identifying and preventing violations of the legislation of the Russian Federation in the field of personal data.

1.2. This Policy has been developed in accordance with and taking into account the following provisions:

- The Constitution of the Russian Federation;
- The Labor Code of the Russian Federation;
- The Civil Code of the Russian Federation;
- Federal Law No. 195-FZ of December 30, 2001 "Code of Administrative Offences of the Russian Federation";
- Federal Law No. 149-FZ of July 27, 2006 "On Information, Information Technologies and Information Protection";
- Federal Law No. 152-FZ of July 27, 2006 "On Personal Data";
- Federal Law No. 132-FZ of November 24, 1996 "On the basics of tourist activity in the Russian Federation";
- Decree of the Government of the Russian Federation No. 687 of September 15, 2008 "On Approval of the Regulation on the Specifics of processing Personal Data performed without the use of automation tools";
- Decree of the Government of the Russian Federation No. 1119 of November 01, 2012 "On Approval of Requirements for the Protection of Personal data when Processing Them in Personal Data Information Systems";
- Decree of the Government of the Russian Federation No. 1853 of November 18, 2020 "On Approval of the Rules for Providing Hotel Services in the Russian Federation";
- FSTEC Order No. 21 of February 18, 2013 "On Approval of the Composition and Content of Organizational and Technical measures to ensure the security of personal data when Processing them in Personal Data Information Systems";
- other regulatory legal acts of the Russian Federation in the field of personal data.

1.3. The purpose of the Policy is to ensure the protection of human and civil rights and freedoms when processing their personal data, including the protection of the rights to privacy, personal and family secrets, and is aimed, inter alia, at protecting against unauthorized access to personal data of Guests.

1.4. This Policy applies in full to all Hotel Guests who have made room reservations for the purpose of receiving hotel services or who have taken the necessary actions for the purpose of receiving other services provided by the Hotel, to all personal data of Guests and to information processed by the Hotel, automatically or without the use of automation tools, in particular collected:

- on the official website of the Hotel www.hotel-ohotnik.com;
- through applications for computers and mobile devices.
- on social media pages managed by the Hotel.
- by sending out electronic messages and communicating with the Guest online or in person;

- using third parties and other sources, such as publicly available databases.
- in case of visiting or staying as a Guest in a Hotel or in any other non-network interaction.

1.5. The Hotel is obliged to publish or otherwise provide unrestricted access to this Policy in accordance with Part 2 of Article 18.1 of Federal Law No. 152-FZ of July 27, 2006 "On Personal Data".

1.6. Basic concepts used in the Policy:

Personal data— any information related directly or indirectly to a specific or identifiable individual (subject of personal data).

Operator— a legal entity that independently or jointly with other persons organizes and / or performs the processing of 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;

Processing of personal data— any action (operation) or a set of actions (operations) personal data collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data.

Guest— site user www.hotel-ohotnik.com (hereinafter referred to as the Site), as well as a Hotel Guest who has performed actions to book a room fund in order to receive hotel services or who has performed the necessary actions in order to receive other services provided by the Hotel.

Automated processing of personal data— processing of personal data using computer technology.

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— a mandatory requirement for the operator or other person who has obtained access to personal data to prevent their dissemination without the consent of the personal data subject or other legal grounds.

Dissemination of personal data— actions aimed at disclosing personal data to an indefinite group of persons.

Provision of personal data— actions aimed at disclosing personal data to a certain person or a certain group of persons.

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

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

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

2. Principles and purposes of personal data processing

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

- legality and fair basis;
- restrictions on the processing of personal data to achieve specific, pre-defined and legitimate goals;
- preventing the processing of personal data that is incompatible with the purposes of personal data collection;
- preventing the association of databases containing personal data, the processing of which is carried out for purposes that are incompatible with each other;
- compliance of the content and volume of personal data processed with the stated purposes of processing;

- preventing the processing of personal data that is excessive in relation to the stated purposes of their processing;
- ensuring the accuracy, sufficiency and relevance of personal data in relation to the purposes of personal data processing;
- destruction of personal data after the purposes of their processing have been achieved, or in the event that it is no longer necessary to achieve these goals, if it is impossible for the Hotel to eliminate the violations of personal data committed, unless otherwise provided by federal law.

2.2. The Operator processes personal data for the following purposes:

- provision of hotel services in the Hotel, in accordance with the category assigned to the Hotel;
- booking of hotel rooms;
- conclusion of contracts for the provision of hotel services with the subject of personal data;
- organization of marketing and / or advertising campaigns and other events;
- fulfillment of obligations under civil law contracts, including through third parties and / or through the Website;
- provision of other services to personal data subjects;
- promotion of Hotel services in the market by making direct contacts with personal data subjects through various means of communication (by telephone, e-mail, mailing list, in social networks in the information and telecommunications network "Internet", etc.);
- formation of exclusive personal offers, accrual of points for bonus programs;
- directions of news, ongoing promotions and special offers (with the Guest's consent to receive such information). The website and registration card form provide for obtaining the Guest's consent to send out news, information about promotions and special offers;
- conducting surveys and questionnaires in order to improve the quality of service in the Hotel. After the Guest's departure or at the Guest's departure from the Hotel, the Hotel can send the Guest a letter or questionnaire with a request to reflect the impressions of the Hotel and evaluate the quality of the services provided. Filling out such forms is the sole right of the Guest;
- for other purposes that are not prohibited by federal legislation or international treaties of the Russian Federation.

2.3. In order to properly perform its duties as a Personal Data Operator, the Hotel processes personal data of individuals who are in contractual, civil relations with the Hotel, consumers of hotel services, participants of the loyalty program and other promotions necessary for the proper performance of contractual obligations.

2.4. The Operator processes personal data if at least one of the following conditions is met:

2.4.1. personal data processing is carried out with the consent of the personal data subject to the processing of his / her personal data, which can be provided in one of the following ways:

- when booking hotel services and / or paying for booked hotel services, as a user of the Site, the Guest provides the Hotel with their personal data and gives full and unconditional consent to their processing;
- upon check-in at the hotel, the Guest signs a Contract for the provision of hotel services, which the hotel administrator fills out in the presence of the Guest and upon presentation of the Guest's passport. By signing the Hotel Services Agreement, the Guest confirms the accuracy of personal data and gives consent to the processing of their personal data;

2.4.2. the processing of personal data is necessary for achieving the purposes stipulated by an international treaty of the Russian Federation or a law, for performing and fulfilling the functions,

powers and duties assigned to the Operator by the legislation of the Russian Federation;

2.4.3. 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. in accordance with the legislation of the Russian Federation on enforcement proceedings;

2.4.4. processing of personal data is necessary for the performance of a contract to which the personal data subject is a party or beneficiary or guarantor;

2.4.5. processing of personal data is necessary for the exercise of the rights and legitimate interests of the operator or third parties or for the achievement of socially significant goals, provided that the rights and freedoms of the personal data subject are violated;

2.4.6. processing of personal data is carried out, access to which is granted to an unlimited number of persons by the personal data subject or at his request (hereinafter referred to as publicly available personal data);

2.4.7. processing of personal data subject to publication or mandatory disclosure in accordance with federal law.

3. Categories of personal data

3.1. The Hotel processes the following categories of personal data of hotel service consumers:

- last name, first name, patronymic (if any);
- gender.
- date of birth (date, month, and year of birth).
- place of birth.
- information about citizenship;
- type, series, number of the identity document of a citizen of the Russian Federation, name of the body, code of the subdivision of the body that issued it, date of issue;
- address of registration at the place of residence (place of stay);
- details of visas, migration cards, and residence permits.
- contact phone number or information about other communication methods.
- dates of Hotel check-in;
- state number of the client's vehicle when it is located in the hotel parking lot;
- other information required in connection with the conduct of statutory activities, as well as the implementation of contractual relations for the provision of hotel services.

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

3.3. The Hotel does not transfer personal data across borders.

3.4. Processing of biometric personal data in the Hotel is allowed only with the written consent of the personal data subject, except for cases stipulated by the legislation of the Russian Federation.

3.5. In more rare cases, the Hotel has the right to collect images, as well as video and audio data, using security video cameras installed in public places, for example, in the lobby and halls of the Hotel.

3.6. The Hotel may collect data on preferences in order to improve the quality of services provided, including information about interests, reviews of the Hotel's services, thanks to which the Hotel can improve them, and certain restrictions related to nutrition or health. The hotel may also collect information about personal preferences, which may include significant dates (such as a birthday or wedding anniversary) and favorite activities.

3.7. Consent to the processing of personal data allowed by the Guest for distribution is issued separately from other consents of the personal data subject to the processing of his / her personal data.

3.8. Hotel employees receive all personal data directly from the personal data subject – the Guest. The guest is fully responsible for providing false, as well as other people's, personal data. If the Guest provides any Personal Data about other persons to the Hotel or Hotel Service Providers (for example, when booking for another person), the Guest confirms that he has the right to do so and allows the use of this data in accordance with this Policy. When paying for services with a bank card, the Guest independently enters the bank card details necessary for making and processing the payment. Such data is not technically available for the Hotel. The Hotel does not have access to them, does not store or use the Guests' bank card data in any way. Confidentiality of the personal information provided is ensured by the bank that provided the payment system (platform).

3.9. The personal data subject provides the Hotel with consent to carry out advertising and informational newsletters about discounts, promotions, new offers, etc. using various means of communication: mail, email, telephone, Internet, social networks, etc. The frequency of such mailings is determined by the Hotel at its discretion unilaterally.

3.10. The Guest has the right to refuse to receive advertising and other information without explaining the reasons for refusal. At the same time, if the Guest does not wish to receive the specified mailing lists, they must unsubscribe from the mailing list by sending a corresponding message to the Hotel's email address.

3.11. Service messages informing the Guest about the booking of services and the stages of processing their requests are solely informational in nature about the procedure for executing the request, are not an advertising newsletter and are sent automatically.

3.12. When a Guest visits the Site, the Hotel processes data that does not directly identify the Site visitor. This data is fragments of information that are used by the server to exchange status data with the Internet user's browser, in particular, information about the browser and device used by the site user, the site's browsing history, and the pages viewed. This information is collected by the Hotel using cookies, pixel tags ("dot markers") and other similar technologies. This information is used by the Hotel for:

- to ensure security and simplify site navigation,
- collect statistical information and provide data more efficiently,
- ensuring the correct operation of the Site and providing the necessary search results in accordance with the selected parameters,
- sending and tracking responses to online advertising and Hotel marketing messages.

3.13. Cookies used on the Website may be processed by third parties who have a corresponding agreement with the Hotel.

4. Procedure for processing personal data

4.1. The processing of personal data by the Hotel in the interests of Guests consists in receiving, organizing, accumulating, storing, updating (updating, changing), using, distributing, blocking, destroying and protecting against unauthorized access to personal data of customers;

4.2. Only Hotel employees who are authorized to work may have access to the processing of personal data of Guests with the client's personal data and signed an Agreement on non-disclosure of the client's personal data.

4.3. The processing of personal data in the Hotel is carried out with or without the use of automation tools.

4.4. The use and storage of biometric personal data outside of personal data information systems may

be carried out only on such material data carriers and with the use of such storage technology that protects these data from unauthorized or accidental access to them, their destruction, modification, blocking, copying, provision, distribution.

4.5. Processing of personal data without the use of automation tools is carried out taking into account the requirements of the Regulation on the Specifics of processing personal data performed without the use of automation Tools, approved by Decree of the Government of the Russian Federation No. 687 of September 15, 2008 "On Approval of the Regulation on the Specifics of Processing Personal Data performed without the Use of Automation tools".

4.6. Personal data, when processed without the use of automation tools, must be separated from other information, in particular by recording them on separate material carriers of personal data, in special sections or in the fields of forms (forms). When recording personal data on tangible media, it is not allowed to record personal data on one tangible medium, the processing purposes of which are obviously incompatible.

4.7. In the case of personal data processing in personal data information systems, access to such an information system is granted to authorized persons who have the right to process personal data in accordance with the functions provided for in the official regulations (job descriptions).

4.8. Hotel employees who have the right to process personal data in the Hotel's information systems are provided with a unique login and password to access the relevant information system. Information can be entered both in automatic mode and in manual mode when receiving information on paper or in any other form that does not allow its automatic registration.

5. Confidentiality of personal data

5.1. Personal data is confidential and protected information in accordance with the legislation.

5.2. The Operator and other persons who have obtained access to personal data are obliged not to disclose or distribute personal data to third parties without the consent of the personal data subject, except in cases where this is necessary in order to prevent threats to life and health, as well as in cases established by federal laws.

5.3. Upon a reasoned request, the Hotel may provide or transfer the Guest's personal data to third parties in the following cases:

- if disclosure of this information is required for compliance with the law, execution of a judicial act;
- to assist in conducting investigations carried out by law enforcement or other government agencies to protect the legal rights of the client and the hotel;
- to protect the legal rights of the client and the hotel;
- to other bodies in cases established by regulatory legal acts that are mandatory for execution.

5.4. Hotel employees do not answer questions related to the transfer of personal data by phone or fax.

5.5. The Hotel does not have the right to distribute personal data of Guests to third parties without the consent of the personal data subject to distribute such data.

5.6. Consent to the processing of personal data allowed by the Guest for distribution is issued separately from other consents of the personal data subject to the processing of his / her personal data.

5.7. All confidentiality measures for the collection, processing and storage of personal data of Guests apply to all data carriers, both paper and automated.

5.8. The Operator 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, on the basis of a contract concluded with this person. A person who processes personal data on behalf of the Operator must comply with the principles and rules for processing personal data provided for by Federal Law No. 152-FZ of July 27, 2006 and this Policy.

6. Requirements for personal data protection

6.1. The security of personal data processed by the Operator is ensured by the implementation of legal, organizational and technical measures necessary to meet the requirements of Federal legislation in the field of personal data protection. 6.2. To prevent unauthorized access to personal data in the Hotel, the following organizational and technical measures are applied:

- appointment of officials responsible for organizing the processing and protection of personal data;
- restriction of the number of persons allowed to process personal data;
- conducting preventive work with officials who have access to personal data, aimed at preventing cases of unauthorized transfer of such data, familiarizing employees with the provisions of the legislation of the Russian Federation on personal data, including the requirements for personal data protection;
- accounting of electronic (magnetic) data carriers, as well as implementation of measures aimed at ensuring the safety of these material data carriers;
- identification of threats to the security of personal data when processing them in the personal data information system, formation of a threat model;
- application of information security tools in the personal data information system — - differentiation of users ' access to information resources and software and hardware information processing tools;
- registration and accounting of actions of users of personal data information systems;
- use of anti-virus tools and personal data backup and recovery tools;
- use of inter-network shielding, intrusion detection, security analysis, and cryptographic information protection tools when necessary;
- organization of access control to the Hotel territory, security of premises with technical means of processing personal data;
- storage of documents containing personal data of Guests in specially designated areas of the Hotel that provide protection against unauthorized access;
- other legal, organizational (corporate), technical and other protection measures not prohibited by the legislation of the Russian Federation.

6.3. Access of Hotel employees to personal data processed in the Hotel's information system, as well as to their material carriers, is made only for the performance of their work duties. Workplaces and places where personal data is stored are equipped in such a way as to prevent uncontrolled use of confidential information. Access to the personal data of Guests of Hotel employees who do not have properly registered access is prohibited.

7. Terms of storage of personal data

7.1. The Hotel stores personal data of Guests for as long as it is required to perform the actions provided for in this Policy, for other stated periods or periods permitted by the current legislation. The Hotel has the right to store personal data of Guests if it is objectively necessary to fulfill any legal obligations, requirements of regulatory authorities, resolve disputes or legal claims, as well as if it is required for other purposes to meet the requirements of the Policy, prevent fraud and abuse.

7.2. When determining the appropriate period of storage of personal data of Guests, the Hotel takes into account the volume, nature and degree of confidentiality of personal data, the potential risk in case of unauthorized use or disclosure of data, the purpose of processing this personal data, as well as the possibility of achieving these goals by other means and the requirements of current legislation.

7.3. The term of storage of personal data processed in personal data information systems must correspond to the term of storage of personal data on paper media.

7.4. Personal data is subject to destruction in the following cases:

- if the purpose of personal data processing is achieved or if it is no longer necessary to achieve the purpose of personal data processing, unless otherwise provided for by regulatory legal acts of the Russian Federation;
- when changing or invalidating the regulatory legal acts that establish the legal basis for processing personal data;
- when identifying the fact of illegal processing of personal data;
- when the subject of personal data withdraws consent, unless otherwise provided for by regulatory legal acts of the Russian Federation.

8. Consideration of requests from personal data subjects or their representatives

8.1. Personal data subjects have the right to receive information concerning the processing of their personal data at the Hotel, including information containing:

- confirmation of the processing of personal data by the Hotel;
- legal grounds and purposes of personal data processing;
- methods of processing personal data used by the Hotel;
- name and location of the Hotel, information about persons who have access to personal data or to whom personal data may be disclosed on the basis of a contract with the Hotel, or on the basis of the legislation of the Russian Federation;
- processed personal data related to the relevant subject of personal data, the source of their receipt, unless another procedure for submitting such data is provided for by the legislation of the Russian Federation;
- terms of processing of personal data, including the terms of their storage;
- the procedure for the exercise by the personal data subject of the rights provided for by the legislation of the Russian Federation in the field of personal data;
- name of the organization or surname, first name, patronymic and address of the person who processes personal data on behalf of the Hotel, if the processing is or will be entrusted to such an organization or person;
- other information provided by the legislation of the Russian Federation in the field of personal data.

8.2. Information on requests is provided to the personal data subject or his representative by an authorized official of the Hotel within ten working days from the moment the Hotel requests or receives the request from the personal data subject or his representative. The request must contain:

- number, series of the main identity document of the personal data subject or his representative, date of issue, name of the issuing authority;
- information confirming the participation of the personal data subject in relations with the Hotel (a document confirming the provision of contractual services by the Hotel) or information otherwise confirming the processing of personal data by the Hotel;
- signature of the personal data subject or their representative. The request can be sent in the form of an electronic document and signed with an electronic signature in accordance with the legislation of the Russian Federation.

8.3. If the information specified in clause 8.1 of this Policy, as well as the personal data being processed, was provided for review to the personal data subject upon request, the personal data subject has the right to apply again to the Hotel or send a second request in order to obtain the specified information and get acquainted with the personal data no earlier than thirty days after the initial if a shorter period of time is not established by the legislation of the Russian Federation, a regulatory legal act adopted in accordance with it, or a contract to which the personal data subject is a party or beneficiary or

guarantor.

8.4. The personal data subject has the right to apply again to the Company or send it a repeated request in order to obtain the information specified in clause 8.1 of this Policy, as well as to get acquainted with the processed personal data before the expiration of the period specified in clause 8.3 of this Policy, if such information and (or) the processed personal data do not They were made available to him for full review based on the results of consideration of the initial application. The repeated request, along with the information specified in clause 8.2 of this Policy, must contain the justification for sending a repeated request.

8.5. The Hotel has the right to refuse the personal data subject to fulfill a repeated request that does not meet the conditions stipulated in clauses 8.3 and 8.4 of this Policy. Such refusal must be motivated. It is the responsibility of the Hotel to provide evidence of the validity of the refusal to comply with the repeated request.

8.6. The right of a personal data subject to access his / her personal data may be restricted in accordance with the legislation of the Russian Federation, including if the personal data subject's access to his / her personal data violates the rights and legitimate interests of third parties.

9. Final provisions

9.1. This Policy is binding on all employees who have access to the personal data of Guests.

9.2. The Operator reserves the right, if necessary, to update the Policy without prior notice, including in case of changes in the legislation on personal data. The current version of the Policy is published on the Website.

9.3. Other rights and obligations of the Hotel, as the operator of personal data, in connection with the processing of personal data are determined by the legislation of the Russian Federation in the field of personal data.

9.4. The Hotel is responsible for the personal information that is at its disposal and establishes the personal responsibility of employees for compliance with the established confidentiality regime.

9.5. Each employee who receives a document containing the Guest's personal data for work is solely responsible for the security of the carrier and confidentiality of information.

9.6. Hotel employees guilty of violating the rules governing the processing and protection of personal data bear material, disciplinary, administrative, and civil liability in accordance with the procedure established by Federal Laws.