

Appendix № 1 to Order № 04-PDN of "13" December 2019

ASIMUT HOTELS COMPANY LLC PERSONAL
DATA PROCESSING POLICY
Version 1.0 dated December 13, 2019

Moscow

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Terms and definitions

Automated processing of personal data means processing of personal data by means of computer equipment.

Blocking of personal data means temporary termination of personal data processing (except for cases when processing is necessary to clarify personal data).

Informational system of personal data means an aggregate of personal data contained in databases of personal data and information technologies and technical means ensuring its processing.

Personal data depersonalization means actions, as a result of which it is impossible to determine, without the use of additional information, whether the personal data belongs to a particular personal data subject.

Processing of personal data means any action (operation) or a set of actions (operations) performed with or without the use of automation means with personal data, including collection, recording, systematization, accumulation, storage, clarification (updating, change), extraction, use, transfer (distribution, provision, access), anonymization, blocking, removal, destruction of personal data.

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

Personal data - any information related to a directly or indirectly identified or identifiable individual (the subject of personal data).

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

Disclosure of personal data - actions aimed at disclosure of personal data to an indefinite circle of persons (transfer of personal data) or familiarization with personal data to an unlimited circle of persons, including publication of personal data in mass media, placement in information and telecommunication networks or providing access to personal data by any other means.

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

Erasure of personal data means actions resulting in impossibility to restore the content of personal data in the information system of personal data and (or) as a result of which tangible carriers of personal data are deleted.

1. GENERAL PROVISIONS

This document defines the policy of Azimut Hotels Company LLC (hereinafter - the Operator) regarding the processing of personal data and discloses information about measures implemented to ensure security of personal data at the Operator in order to protect human and civil rights and freedoms during processing of personal data, including protection of rights to privacy, personal and family secrets.

This document "Policy of Azimut Hotels Company LLC regarding processing of personal data" (hereinafter - Policy) is developed in accordance with the Constitution of the Russian Federation, Federal Law № 160-FZ "On ratification of the Council of Europe Convention for the Protection of Individuals with regard to Automatic Processing of Personal Data", Labor Code of the Russian Federation № 197-FZ, Federal Law № 152-FZ "On Personal Data" (hereinafter - FZ-152), other federal laws and regulations of the Russian Federation which define cases and specifics.

Provisions of this Policy shall be binding on all employees of the Operator processing personal data, including those working in the Operator's branches and separate subdivisions.

Provisions of this Policy are the basis for organization of work on processing of personal data at the Operator, including for development of internal regulatory documents regulating processing and protection of personal data at the Operator.

In the event that certain provisions of this Policy conflict with applicable personal data laws, the provisions of applicable laws shall apply.

Requests of individuals with regard to processing of their personal data by the Operator shall be accepted at the addresses: 129110, Moscow, Olympic Avenue, 18\1.

Also, personal data owners may send their request, signed by an enhanced qualified electronic signature to the e-mail address: info@azimuthotels.com.

The time limit for processing requests does not exceed 30 (thirty) days from the date of application.

This Policy is a document to which unrestricted access is granted. In order to ensure unrestricted access, the Policy is published on the official websites of the Operator at: www.azimuthotels.com.

2. POLICY AND TERMS OF PERSONAL DATA PROCESSING

2.1 Principles of personal data processing

- Processing of personal data at the Operator is based on the following principles:
- Legality and fair basis;

- Limitation of personal data processing to achieving specific, predetermined and legitimate purposes;
- Avoiding the processing of personal data incompatible with the purposes of personal data collection;
- Not combining databases containing personal data, which are processed for purposes incompatible with each other;
- Processing only those personal data that meet the purposes of its processing;
- Compliance of the content and volume of processed personal data with the stated processing purposes;
- Prevention of processing of personal data that is excessive in relation to the stated purposes of its processing;
- Ensuring accuracy, sufficiency and relevance of personal data in relation to the purposes of personal data processing;
- Destruction or depersonalization of personal data upon achieving the purposes of its processing or in case of loss of necessity in achieving such purposes, if the Operator fails to eliminate violations of personal data, unless otherwise provided by the federal law.

2.2 Terms of personal data processing

The operator processes personal data under at least one of the following conditions:

- The consent of the individual to process his/her personal data has been obtained;
- Processing of personal data is necessary to achieve the goals stipulated by an international treaty of the Russian Federation or law, to perform and fulfill the functions, powers and duties imposed on the operator by the legislation of the Russian Federation;
- Processing of personal data is necessary for administration of justice, execution of a judicial act, an act of another body or an official to be executed in accordance with the legislation of the Russian Federation on enforcement proceedings
- Processing of personal data is necessary for execution of an agreement, a party to which or a beneficiary or guarantor, under which the individual is a subject of personal data, as well as for the conclusion of the contract on the initiative of the subject of personal data or the contract, under which the subject of personal data will be a beneficiary or guarantor;
- Processing of personal data is necessary to exercise the rights and legitimate interests of the operator or third parties or to achieve socially important objectives, provided that this does not violate the rights and freedoms of the personal data subject;
- Personal data made public by the individual;
- Personal data subject to publication or compulsory disclosure in accordance with federal law;

2.3 Confidentiality of personal data

The Operator and other persons who have 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.

2.4 Publicly available sources of personal data

For the purpose of information provision, the Operator may create publicly available sources of personal data of individuals, including directories and address books. Surname, name, patronymic, date and place of birth, position, contact telephone numbers, e-mail address and other personal data provided by the subject of personal data may be included in public sources of personal data with written consent of the individual.

Information about the subject of personal data shall at any time be excluded from publicly available sources of personal data at the request of the individual, the authorized body for protection of personal data subjects' rights or by a court decision.

2.5 Special categories of personal data

Processing of special categories of personal data by the Operator, relating to race, ethnicity, political views, religious or philosophical beliefs, health status, intimate life, is allowed in cases where:

- The individual has given his or her written consent to the processing of his or her personal data;
- Personal data is made publicly available by the subject of personal data;
- Processing of personal data is carried out in accordance with the legislation on state social assistance, labor legislation, the legislation of the Russian Federation on state pensions, on labor pensions;
- Processing of personal data is necessary for protection of life, health or other vital interests of the subject of personal data or life, health or other vital interests of other persons and obtaining the consent of the subject of personal data is impossible;
- Processing of personal data shall be carried out for medical and preventive purposes, for purposes of medical diagnosis, provision of healthcare and medical and social services, provided that personal data processing is carried out by a person professionally engaged in medical activities and obliged to maintain patient's confidentiality in accordance with the laws of the Russian Federation;
- Processing of personal data is necessary to establish or exercise the rights of the personal data subject or third parties, as well as in connection with the administration of justice;

- Processing of personal data is carried out in accordance with the legislation on compulsory types of insurance, with the insurance legislation.

The processing of special categories of personal data that was carried out in the cases specified in clause 4 of Art. Article 10(4) of the Federal Law 152 shall be immediately terminated if the reasons that led to its processing are eliminated, unless otherwise stipulated by federal laws.

The Operator may process personal data on criminal records only in cases and in the manner determined in accordance with federal laws.

2.6. Biometric personal data

The information that characterizes the physiological and biological characteristics of an individual, on the basis of which his identity can be established - biometric personal data - can be processed by the Operator only with the consent of the subject of personal data in writing.

2.7 Entrusting processing of personal data to another person

The Operator may entrust processing of personal data to another person with the consent of the subject of personal data, unless otherwise provided by federal law, on the basis of a contract concluded with that party. The person processing personal data on behalf of the Operator shall be obliged to comply with the principles and rules of personal data processing stipulated by FZ-152 and this Policy.

2.8 Processing of personal data of citizens of the Russian Federation

The Operator shall ensure the collection, recording, systematization, accumulation, storage, verification (updating, modification), extraction, transfer (provision, access), deletion, destruction of personal data of citizens of the Russian Federation using databases located in the Russian Federation, except in the cases specified in paragraphs. 2, 3, 4, 8 ч. 1 of Art. 6 of the Federal Law 152.

2.9 Cross-border transfer of personal data

The Operator shall make sure that the foreign country, to the territory of which the transfer of personal data is intended to take place, provides adequate protection of personal data subjects' rights, prior to commencement of such transfer.

Cross-border transfer of personal data to the territory of foreign countries, which does not provide adequate protection of the personal data subjects' rights, may be carried out in cases where - availability of consent in writing of the subject of personal data for transborder transfer of his/her personal data; - execution of an agreement to which the subject of personal data is a party.

3. RIGHTS AND RESPONSIBILITIES

Within the framework of personal data processing, the following rights are defined for the operator and the subjects of personal data.

The personal data subject has the right:

- To receive information relating to the processing of his personal data in the manner, form and time limits established by the legislation on personal data;
- To demand clarification of his personal data, their blocking or destruction in case the personal data are incomplete, outdated, unreliable, illegally obtained, are not necessary for the stated purpose of processing or used for purposes not previously stated when the personal data subject gave consent to the processing of personal data;
- To take statutory measures to protect its rights;
- To revoke their consent to the processing of personal data;
- Other rights provided by the legislation on personal data.

The Operator shall have the right:

- Process personal data on the subject of personal data in accordance with the stated purpose;
- Demand from the subject of personal data to provide accurate personal data necessary for the execution of the contract, identification of the subject of personal data, as well as in other cases provided by the legislation on personal data;
- Restrict access of the subject of personal data to his/her personal data in case access of the subject of personal data to his/her personal data violates rights and legitimate interests of third parties, as well as in other cases provided by the legislation of the Russian Federation;
- Process publicly available personal data on individuals;
- Process personal data subject to publication or compulsory disclosure in accordance with the laws of the Russian Federation
- Entrust the processing of personal data to another person with the consent of the subject of personal data;
- Other rights stipulated by the personal data legislation.

4. ENSURING THE FULFILLMENT OF THE OPERATOR'S RESPONSIBILITIES AND MEASURES FOR PERSONAL DATA PROTECTION

Security of personal data processed by the Operator is ensured by implementing legal, organizational and technical measures required to ensure the compliance with the requirements of federal legislation in the field of protection of personal data. To prevent unauthorized access to personal data, the Operator applies the following organizational and technical measures:

- Appointment of the person responsible for the organization of processing of personal data;
- Appointment of a person responsible for ensuring security of personal data;
- Limitation of the list of persons allowed to process personal data;
- Familiarizing the subjects with the requirements of federal legislation and regulatory documents of the Operator on processing and protection of personal data;
- Organization of recording, storage and circulation of media containing information with personal data;
- Determination of security threats to personal data in the course of personal data processing, formation of threat models on the basis of such models;
- Development of personal data protection system based on the threat model;
- Verification of readiness and efficiency of use of information protection means;
- Delimitation of user access to information resources and software and hardware for information processing
- registration and record of actions of users of personal data information systems;
- Use of antivirus and recovery tools of personal data protection system;
- Use of firewall, intrusion detection, security analysis and cryptographic protection of information where necessary;
- Organization of access control to the Operator's territory, security of premises with technical means of personal data processing.

5. FINAL PROVISIONS

Other rights and responsibilities of the Operator in connection with processing of personal data shall be determined by the legislation of the Russian Federation in the field of personal data. Employees of the Operator guilty of violating the rules governing the processing and protection of personal data shall bear material, disciplinary, administrative, civil or criminal liability in the way prescribed by federal laws.

