



LLC Okhotniy Ryad Management Company (Metropol Hotel)

Personal Data Processing Policy

1. General

1.1. This document shall lay down the Personal Data Processing and Security Policy of LLC Okhotniy Ryad Management Company (hereinafter – the Hotel).

1.2. This Policy has been developed for the purpose of complying with the legislative requirements to the processing and security of personal data and aims at ensuring every kind of protection of human rights and freedoms during the processing of personal data by the Hotel.

1.3. This Policy shall underlie all of the Hotel's processes involving personal data processing and protection.

1.4. This Policy has been developed in accordance with the federal laws of the Russian Federation:

- the Constitution of the Russian Federation;
- Federal Law No. 152-FZ dated 27.07.2006 “Concerning Personal Data”;
- the Labour Code of the Russian Federation Federal Law No. 197-FZ dated 30.12.2001;
- Federal Law No. 132-FZ dated 24.11.1996 “Concerning the Fundamental Principles of Tourist Activities in the Russian Federation”;
- the Regulations on the Provision of Hotel Services in the Russian Federation, approved as per Decree of the Government of the Russian Federation No. 1085 dated 09.10.2015;
- and in accordance with other effective federal laws and by-laws of the Russian Federation laying down the rules and specific modes of the processing of personal data and ensuring security and confidentiality of such processing.

1.5. This Policy shall stipulate:

- the purposes of personal data processing;
- the general principles and rules of personal data processing;
- classification of personal data and Data Subjects;

- rights and duties of Data Subjects and the Hotel in terms of personal data processing;
- personal data processing procedures.

1.6. This Policy shall be published on a common access resource – the Hotel’s official Web site at <https://www.metropol-moscow.ru> and shall be subject to unrestricted access.

1.7. This Policy shall be subject to revision in case of changes in the laws of the Russian Federation concerning personal data processing and protection, upon evaluation of the relevancy, adequacy and effectiveness of the personal data processing security measures undertaken by the Hotel.

1.18. This Policy shall apply to actions (operations) or a combination of actions (operations) carried out in relation to personal data, whether with or without automation tools, including collection, recording, classification, accumulation, storage, rectification (update, alteration), extraction, use, transfer (dissemination, making available, granting access), anonymization, blocking, erasure, and destruction of personal data.

2. Basic Terms and Definitions

Automated personal data processing: processing of personal data with the use of computer equipment.

Biometric personal data: data featuring a person’s physiological and biological characteristics that identify the person and are used by the processor for the identification of Data Subjects.

Personal data blocking: temporary discontinuation of personal data processing (except where processing is required for rectification of personal data).

Personal data security: a level of protection of personal data that enables users, technical means and information technologies to ensure confidentiality, integrity and availability of personal data during their processing in personal data information systems.

Personal data information system: personal data contained in databases and information technologies and technical means ensuring their processing.

Personal data confidentiality: a condition, binding upon the Hotel or other person granted access to personal data, that requires preventing their disclosure and dissemination without consent of a Data Subject or by force of other legal grounds.

Personal data processing: any action (operation) or a combination of actions (operations) carried out in relation to personal data, whether with or without automation tools, including collection, recording, classification, accumulation, storage, rectification (update, alteration), extraction, use, transfer (dissemination, making available, granting access), anonymization, blocking, erasure, and destruction of personal data.

Publicly available personal data: personal data that are available/accessible to the general public with consent of a Data Subject or that are not subject to confidentiality requirements in accordance with the federal laws.

Personal data anonymization: actions (operations) that render it impossible to identify, without using additional information, a specific Data Subject that personal data pertain to.

Processor: a public agency, a municipal authority, a legal entity or an individual that organizes the processing and (or) processes personal data, independently or in cooperation with other parties/persons, and determines the purposes of personal data processing, the composition of personal data subject to processing, and the actions (operations) to be carried out with personal data.

Personal data provision: actions aimed at disclosing personal data to a certain person or a certain group of persons.

Personal data: any information directly or indirectly relating to an identified or identifiable natural person (Data Subject).

Special personal data categories: personal data that concern a Data Subject's ethnicity, nationality, political, religious or philosophical beliefs/views, state of health and private life.

Data Subject: a natural person who is directly or indirectly identified or is identifiable with the use of data.

Personal data destruction: actions (operations) that render it impossible to restore the content of personal data in a personal data information system and (or) that destroy tangible media bearing personal data.

3. Purposes of Personal Data Processing

3.1. The Hotel shall process personal data for the purpose of:

- providing hotel and/or extra services at the Metropol Hotel in accordance with the Metropol Hotel Service Rules published on the Hotel's official Web site at <https://www.metropol-moscow.ru>, the civil laws of the Russian Federation and the Hotel category.
- providing a Data Subject with a confirmation of his/her booking at the Metropol Hotel;
- concluding Metropol Hotel/extra services agreements with Data Subjects and ensuring further execution of such agreements;
- arranging and maintaining HR records at the Hotel;
- selecting and recruiting staff for the Hotel;
- generating statistical reports, in particular, for their submission to the public supervisory authorities of the Russian Federation;

- providing a Data Subject with information about offered services, on-going promotions and new services;
- for other purposes as may be pursued in accordance with the federal laws and international treaties of the Russian Federation.

4. Classification of Personal Data. Categories of Data Subjects Whose Personal Data are Processed by the Hotel

4.1. Personal data shall include any information that relates, directly or indirectly, to an identified or identifiable natural person (Data Subject) and is processed by the Hotel for achieving the stated purposes.

4.2. The Hotel shall not process specific personal data categories concerning ethnicity, nationality, political, religious and philosophical beliefs/views, unless otherwise stipulated by the laws of the Russian Federation.

4.3. The Hotel shall process personal data of the following Data Subject categories:

- natural persons who are the Hotel's staff members;
- natural persons who seek jobs at the Hotel;
- natural persons who perform works and provide services under civil law contracts/agreements concluded with the Hotel;
- natural persons who are the Hotel's clients (guests) and/or who lawfully represent interests of the Hotel's clients, or who intend to become such;
- natural persons who purchase or intend to purchase third-party services through the mediation of the Hotel provided that their personal data are in the Hotel's automated systems in connection with hotel and/or extra services provided to them by the Hotel;
- other natural persons who have given their consent to the processing of their personal data by the Hotel or whose personal data need to be processed by the Hotel for the purpose of performing duties, fulfilling functions or exercising powers assigned and/or stipulated by an international treaty or law of the Russian Federation.

5. Core Principles of Personal Data Processing

5.1. The Hotel shall process personal data by adhering to the following principles:

- legality of the purposes and means of personal data processing;
- consistency of the purposes of personal data processing with the pre-determined purposes declared at the time of personal data collection;
- consistency of the composition and the volume of processed personal data and modes of their processing with the declared processing purposes;

- validity of personal data and their adequacy for processing purposes,
- excluding processing of personal data that are redundant for the purposes declared at the time of personal data collection;
- excluding processing of personal data that are incompatible with the purposes of personal data collection;
- excluding integration of databases containing personal data that are processed for mutually exclusive purposes;
- ensuring that personal data are stored solely as long as is needed for the purposes of personal data processing, unless the period of storage of personal data is set by a federal law, a contract/agreement, under which a Data Subject acts as a party;
- destruction or anonymization of personal data upon achievement of the processing purposes or where such purposes no longer need to be achieved, unless otherwise is stipulated by the laws of the Russian Federation, a contract/agreement, under which a Data Subject acts as a party;
- ensuring confidentiality and security of the personal data processed.

6. Organization of Personal Data Processing

6.1. Personal data shall be processed subject to the principles and rules laid down by Federal Law No. 152-FZ dated 27.07.2006 “Concerning Personal Data”.

6.2. The Hotel shall process personal data both with and without using automation tools.

6.3. The Hotel may incorporate subjects’ personal data in publicly available sources of personal data; in such case, the Hotel shall obtain a subject’s written consent to the processing of his/her personal data.

6.4. No decisions that entail legal implications with respect to a Data Subject or otherwise involve his/her rights and legitimate interests shall be made solely on the basis of automated personal data processing.

6.5. In cases where it is not required to obtain a subject’s written consent to the processing of his/her personal data, the subject’s consent may be given by the Data Subject or his/her representative in any form ensuring receipt of such consent.

6.6. Given a Data Subject’s consent, the Hotel may authorize another entity to process the subject’s personal data, unless otherwise stipulated by the federal law, on the basis of a contract/agreement to be concluded with such other entity (hereinafter – the Processor’s authorization). In such contract/agreement the Hotel shall commit the entity that processes personal data upon the Hotel’s authorization to abide by the personal data processing principles and rules stipulated by the said Federal Law.

6.7. Public authorities (including supervisory, control, law enforcement and other agencies) shall be granted access to the personal data processed by the Hotel to the extent and in the manner stipulated by the relevant laws of the Russian Federation.

7. Rights of a Data Subject

7.1. A Data Subject shall have the right to:

- be provided with information concerning the processing of his/her personal data, in the manner, in the form and at the timings set by the Personal Data Law;
- demand rectification of his/her personal data, their blocking or destruction

if personal data are incomplete, outdated, unreliable, illegally obtained, unnecessary for the declared processing purpose or are used for purposes that were not previously stated at the time the Data Subject was giving his/her consent to their processing;

- take measures as are prescribed by the laws to defend his/her rights;
- revoke his/her consent to the processing of personal data.

7.2. A Data Subject shall provide complete, accurate and reliable personal data.

7.3. A Data Subject's right to access to his/her personal data may be limited in accordance with the federal laws.

8. Rights and Duties of the Hotel When Processing Personal Data

8.1. The Hotel shall have the right to:

- process a Data Subject's personal data according to the declared purpose;
- demand that a Data Subject provide reliable personal data as may be necessary for the execution of a contract/agreement, provision of services,
- identification of the Data Subject, as well as in other cases stipulated by the Personal Data Law;
- limit a Data Subject's access to his/her personal data if such access infringes rights and legitimate interests of third parties as well as in other cases stipulated by the laws of the Russian Federation;
- process publicly available personal data of natural persons;
- process personal data subject to publication or mandatory disclosure in accordance with the laws of the Russian Federation;
- rectify, block or erase the personal data processed by the Hotel where such data are incomplete, outdated, inaccurate, illegally obtained, or unnecessary for the declared processing purpose;

- keep records of requests/letters of Data Subjects;
- authorize another entity to process personal data, given consent of a Data Subject.

8.2. In accordance with the requirements of the Federal Law “Concerning Personal Data”

the Hotel shall:

- provide a Data Subject at request thereof with information concerning the processing of the subject’s personal data, or legally deny such information.
- at the request of a Data Subject, rectify, block or erase the personal data processed by the Hotel where such personal data are incomplete, outdated, inaccurate, illegally obtained, or unnecessary for the declared processing purpose.
- keep records of requests/letters of Data Subjects.
- notify a Data Subject of personal data processing in cases where such personal data have been obtained from a person other than the Data Subject, except in cases stipulated by the laws of the Russian Federation.
- upon achievement of the purposes of personal data processing, immediately discontinue processing personal data and destroy respective personal data, unless otherwise stipulated by a contract/agreement, under which the Data Subject acts as a party, or other agreement between the Hotel and the Data Subject.
- if a Data Subject revokes his/her consent to the processing of his/her personal data, discontinue processing personal data and destroy personal data within a term set by the laws of the Russian Federation. The Hotel shall notify the Data Subject of the destruction of his/her personal data.
- the Hotel shall not disclose and shall commit other persons/parties granted access to personal data not to disclose personal data to third parties and to refrain from disseminating personal data without consent of a Data Subject, unless otherwise stipulated by the federal law.
- designate an officer(s) to be in charge of the organization of personal data processing.

9. Measures to Ensure Security of Personal Data during Processing

9.1. When processing personal data, the Hotel shall take the necessary legal, organizational and technical measures in order to protect personal data from illegal or accidental access thereto, destruction, alteration, blocking, copying, provision and dissemination as well as from other unlawful actions with respect to personal data.

9.2. In order to ensure security of personal data the Hotel shall, inter alia:

- Identify threats to the safety of personal data when processing them in personal data information systems.
- Implement organizational and technical measures for the purpose of ensuring security of personal data during their processing in personal data information systems, as may be necessary

for complying with the personal data protection requirements to be fulfilled to maintain the levels of protection of personal data set by the Government of the Russian Federation.

- Evaluate the effectiveness of the measures undertaken to ensure security of personal data, before a personal data information system is put into operation.
- Keep records of machine-readable media bearing personal data.
- Detect unauthorized access to personal data and take appropriate measures.
- Restore personal data that have been modified or destroyed as a result of unauthorized access thereto.
- Set rules of access to the personal data processed in a personal data information system and register and keep records of any and all actions (operations) with personal data in the personal data information system.
- Train the Hotel's staff involved in personal data processing in terms of personal data security.
- Monitor the measures implemented in order to ensure security of personal data and the level of protection of personal data information systems.

10. Liability of the Hotel

10.1. Officers designated by order of the Hotel's executive body shall be in charge of monitoring the implementation of this Policy, the observance of the rules and requirements applicable to the processing of personal data.

10.2. The Hotel and its officers and employees shall be subject to criminal, civil, administrative and disciplinary liability for failure to abide by the principles and terms of personal data processing as well as for disclosure or unlawful use of personal data, in accordance with the laws of the Russian Federation.