Regulation on the Processing and Protection of Personal Data of Guests Residing in Hotels of JSC "Hotel Complex "Slavyanka"

1. General Provisions

1.1. This Regulation is governed by the Constitution of the Russian Federation and international treaties of the Russian Federation, Federal Law No. 152-FZ of July 27, 2006 "On Personal Data", Federal Law No. 149-FZ of July 27, 2006 "On Information, Information Technologies, and Information Protection", and other regulatory legal acts.

1.2. Key terms used in the Regulation:

Hotel – a property complex (buildings, part of a building) intended for providing hotel services, as well as related services for guest accommodation (restaurant services, conference organization, events, etc.), which is part of JSC "Hotel Complex "Slavyanka" (as a branch or structural unit);

Guest – a natural person, a consumer of hotel services, a personal data subject;

Hotel services – a complex of services for providing temporary accommodation in a hotel, including related services, the list of which is determined by the Hotel;

Websites – websites owned by JSC "Hotel Complex "Slavyanka", which display information about its activities, as well as the activities of its branches, structural units providing hotel services (Hotels);

Personal data – any information relating directly or indirectly to an identified or identifiable natural person (personal data subject);

Operator – JSC "Hotel Complex "Slavyanka", including its branches, which independently or jointly with other persons organizes and/or carries out the processing of personal data, and also determines the purposes of personal data processing, the composition of personal data to be processed, and the actions (operations) performed with personal data;

Personal data processing – any action (operation) or 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 (dissemination, provision, access), anonymization, blocking, deletion, destruction of personal data;

Dissemination of personal data – actions aimed at disclosing personal data to an indefinite circle of persons;

Use of personal data – actions (operations) with personal data performed by the operator for the purpose of making decisions or performing other actions that entail legal consequences for the personal data subject or other persons, or otherwise affecting the rights and freedoms of the personal data subject or other persons;

Confidentiality of personal data – a mandatory requirement for the operator or any other person who has gained access to personal data not to allow their dissemination without the consent of the personal data subject or other lawful basis;

Blocking of personal data – temporary cessation of personal data processing (except in cases where processing is necessary for clarification of personal data);

Destruction of personal data – actions as a result of which it becomes impossible to restore the content of personal data in the personal data information system and/or as a result of which physical carriers of personal data are destroyed;

Anonymization of personal data – actions as a result of which it becomes impossible, without the use of additional information, to determine the affiliation of personal data to a specific personal data subject.

1.3. This Regulation establishes the procedure for processing personal data of Guests for whom the Hotel provides the full range of services for reception and accommodation in the Hotel.

1.4. The purpose of the Regulation is to ensure the protection of human and civil rights and freedoms

when processing their personal data.
1.5. Personal data is processed for the purpose of executing the contract for the provision of accommodation or temporary placement services, to which the Guest is a party. The Hotel collects data only to the extent necessary to achieve the stated purpose.
1.6. Personal data cannot be used to cause property and moral damage to citizens, or to hinder the exercise of rights and freedoms of citizens of the Russian Federation.
1.7. This Regulation is approved by the General Director (or an authorized person) and is mandatory for all employees who have access to Guests' personal data.

2. Composition and Receipt of Guests' Personal Data

2.1. The personal data collected and processed by the Hotel include:

- Questionnaire data (surname, first name, patronymic, date, month, year of birth);
- Passport data;
- Permanent residence address;
- Contact phone number;
- Email address;
- Bank card details;
- Employment data (when booking by legal entities for seconded employees).

2.2. All personal data is obtained by Hotel employees directly from the personal data subjects – Guests and/or their legal representatives, legal entities (in relation to seconded persons), when they fill out a registration card upon check-in at the Hotel, or when the Guest provides their personal data on the Hotel's website during booking, or when filling out a feedback form, or posting a review about the services rendered.

3. Processing and Storage of Guests' Personal Data

3.1. The processing of personal data by the Hotel in the interests of Guests involves the collection, systematization, accumulation, recording, storage, clarification (updating, modification), use, dissemination, anonymization, blocking, destruction, and protection against unauthorized access to Guests' personal data.
3.2. Guests' consent to personal data processing is obtained because personal data processing is carried out for the purpose of executing a contract to which the personal data subject – the Guest – is a party.

By registering at the Hotel, the Guest undertakes to complete the Consent to Personal Data Processing specified in the Registration Card. Acceptance (acceptance) of the Consent offer is the Guest's registration at the Hotel. The Guest agrees that the Operator processes their personal data specified in the Registration Card, booking request, and other documents, under the terms provided by this Regulation.
3.3. Access to Guests' personal data processing may only be granted to Hotel employees who are authorized to work with Guests' personal data and have signed a Non-Disclosure Agreement for Guests' personal data.
3.4. The list of Hotel employees with access to Guests' personal data is determined by an order of the General Director (or an authorized person, branch director).
3.5. Guests' personal data on paper carriers are stored in the structural unit responsible for registering and accommodating Guests at the Hotel.
3.6. Guests' personal data in electronic form are stored in the Hotel's local computer network, in

electronic folders and files on the personal computers of the head of the structural unit responsible for registering and accommodating Guests, as well as employees authorized to process Guests' personal data.
3.7. The Operator has the right to use "cookies" technology. "Cookies" do not contain confidential information. A visitor to the Hotel's website, by accessing the Operator's Websites and using the services located on these Websites, acknowledges that they have read and understood this Regulation, as well as the information collection and processing procedures described therein, and also gives consent to the collection, analysis, and use of cookies, including for statistical purposes.
3.8. The Operator receives information about the IP address of the visitor to the Operator's Website. This information is not used to identify the visitor to the Website.
3.9. In case the Guest/Website Visitor places information directly on the Operator's Website for public viewing (for example, when posting a review, participating in public chats conducted directly on the Operator's Websites, participating in surveys), the Operator is not responsible for the information provided by the Guest/Visitor on the Websites in a publicly accessible form. Such information is considered personal data made publicly available by the personal data subject.

3.10. In case of filling out a feedback form, sending inquiries, requests to the Operator, or using other Operator services via the Operator's Websites, the Visitor is obliged to familiarize themselves with the terms of the User Agreement for the processing of their personal data. Consent to the terms of the User Agreement is given by checking a box in a special field on the Website. In case of disagreement with any provisions of the User Agreement, the User is recommended to stop using the services of the Operator's Websites. Continued use is unequivocally regarded as acceptance of all terms of this agreement.

3.11. Personal data shall be stored in a form that allows the identification of the personal data subject for no longer than is required by the purposes of personal data processing, unless a different storage period for personal data is established by current legislation, a contract to which the personal data subject is a party, beneficiary, or guarantor, or this Regulation.
3.12. Processed personal data are subject to destruction or anonymization upon achievement of the processing goals or in case of loss of the need to achieve these goals, unless otherwise provided by current legislation or this Regulation.

3.13. The destruction of carriers containing personal data is carried out in the following order:
• Personal data on paper carriers are destroyed in a way that prevents document restoration (using shredders – document destroyers);
• Personal data stored in the memory of personal computers are destroyed by deleting them from the memory of personal computers;
• Personal data stored on a flash card, CD-ROM, or other information carrier are destroyed by deleting the file from the carrier, and if necessary, by disabling the functionality of the flash card or CD-ROM.

3.14. Requirements for premises where personal data is processed:
3.14.1. Network equipment and servers should be located in places inaccessible to unauthorized persons (in special rooms, cabinets, boxes);
3.14.2. Guests' personal data on paper carriers must be stored in lockable cabinets, boxes;
3.14.3. Cleaning of premises and maintenance of technical equipment of personal data information systems must be carried out under the control of persons responsible for these premises and technical equipment, observing measures that exclude unauthorized access to personal data, information carriers, software, and technical means of processing, transmitting, and protecting information.

4. Use and Transfer of Guests' Personal Data

4.1. The processing of Guests' personal data by the Hotel is carried out exclusively for the purpose of providing services, for developing new products/services and informing Guests about these products/services (including by phone/email), responding to Guests' inquiries, and also in cases of providing data (information) to executive bodies of state and municipal authorities in accordance with the legislation of the Russian Federation, as well as for the purpose of complying with current legislation of the Russian Federation.

4.2. When transferring Guests' personal data, the Hotel must comply with the following requirements:
4.2.1. Warn the persons receiving Guests' personal data that these data may only be used for the purposes for which they were communicated, and require these persons to confirm that this rule has been observed. Persons receiving Guests' personal data are obliged to observe the confidentiality regime. This provision does not apply in the case of anonymization of personal data and with respect to publicly available data.
4.2.2. Allow access to Guests' personal data only to specially authorized persons, and these persons must have the right to receive only those personal data that are necessary for performing specific functions.
4.2.3. When cross-border transfer of personal data, the Hotel is obliged to ensure that the foreign state to whose territory the personal data is transferred provides adequate protection of the rights of personal data subjects.
4.2.4. Cross-border transfer of personal data to the territories of foreign states that do not ensure adequate protection of the rights of personal data subjects may be carried out in the following cases:

- With the written consent of the Guest;
- As provided for by international treaties of the Russian Federation on visa issuance, international treaties of the Russian Federation on legal assistance in civil, family, and criminal cases, as well as international treaties of the Russian Federation on readmission;
- As provided for by federal laws, if necessary for the protection of the foundations of the constitutional order of the Russian Federation, ensuring national defense and state security;
- For the performance of a contract to which the personal data subject is a party;
- For the protection of the life, health, or other vital interests of the personal data subject or other persons, when it is impossible to obtain the personal data subject's written consent.

4.3. It is not permitted to answer questions related to the transfer of information containing personal data by phone or fax.
4.4. The Hotel has the right to provide or transfer Guests' personal data to third parties in the following cases:
If the disclosure of this information is required to comply with the law or a court order;
To assist in investigations conducted by law enforcement or other state bodies;
To protect the legitimate rights of Guests and the Hotel.
4.5. In case the Guest withdraws consent, the Hotel has the right to continue processing without the Guest's consent if there are grounds specified in clauses 2-11 of part 1 of Article 6, part 2 of Article 10, and part 2 of Article 11 of Federal Law No. 152-FZ "On Personal Data".
4.6. It is not allowed to combine databases containing personal data whose processing is carried out for mutually incompatible purposes.

5. Protection of Guests' Personal Data from Unauthorized Access

5.1. The Hotel is obliged, when processing Guests' personal data, to take necessary organizational and

technical measures to protect personal data from unauthorized or accidental access to them, destruction, modification, blocking, copying, dissemination of personal data, as well as from other unlawful actions.
5.2. For effective protection of Guests' personal data, it is necessary to:
5.2.1. Observe the procedure for obtaining, recording, and storing Guests' personal data;
5.2.2. Use technical means of security and alarm systems;
5.2.3. Conclude with all employees involved in obtaining, processing, and protecting Guests' personal data an Agreement or other document on the non-disclosure of Guests' personal data;
5.2.4. Hold employees accountable under disciplinary action for violating norms regulating the obtaining, processing, and protection of Guests' personal data.
5.3. Access to Guests' personal data by Hotel employees who do not have properly formalized access is prohibited.
5.4. Documents containing Guests' personal data are stored in the premises of the Accommodation Service, ensuring protection against unauthorized access.
5.5. Protection of access to electronic databases containing Guests' personal data is ensured by:

- The use of licensed software products that prevent unauthorized access by third parties to Guests' personal data;
- A password system. Passwords are set by the system administrator and communicated individually to employees who have access to Guests' personal data.

5.6. Copying and making extracts of Guests' personal data is allowed exclusively for official purposes with the written permission of the head.
5.7. Access of the Company's employees to Guests' personal data ceases on the date of termination of employment relations, or the date of change in the employee's job duties, or their exclusion from the list of persons authorized to access personal data. In case of an employee's dismissal, all carriers containing personal data that, in accordance with job duties, were at the employee's disposal during their work at the Hotel, must be transferred to their direct supervisor.
5.8. Hotel employees are obliged to immediately report to their direct supervisor any loss or shortage of information carriers constituting personal data, attempts by unauthorized persons to obtain personal data processed in the Company from the employee, as well as the reasons and conditions for a possible leak of personal data.
5.9. When collecting and processing personal data by a Hotel employee who, in accordance with job duties, receives personal data from a Guest or another person, the authenticity of documents containing personal data is verified. Processing of Guest's personal data is carried out by employees who have access to the relevant Guests' personal data.

6. Obligations of the Hotel

6.1. The Hotel is obliged to:
6.1.1. Process Guests' personal data exclusively for the purpose of providing hotel and related services to Guests.
6.1.2. Obtain the Guest's personal data directly from them. If the Guest's personal data can only be obtained from a third party, the Guest must be notified in advance and their written consent must be obtained. Hotel employees must inform Guests about the purposes, intended sources, and methods of obtaining personal data, as well as the nature of the personal data to be obtained and the consequences of the Guest's refusal to give written consent to their receipt.

6.1.3. Not collect or process Guests' personal data concerning their race, nationality, political views, religious or philosophical beliefs, health status, intimate life, except in cases provided by law, or when

the Guest makes such information publicly available.
6.1.4. Provide access to their personal data to the Guest or their legal representative upon request or upon receipt of a query containing the number of the main identity document of the Guest or their legal representative, information about the date of issue of the said document and the issuing authority, and the personal signature of the Guest or their legal representative. The request may be sent in electronic form and signed with an electronic digital signature in accordance with the legislation of the Russian Federation. Information on the availability of personal data must be provided to the Guest in an accessible form and must not contain personal data relating to other personal data subjects.
6.1.5. Restrict the Guest's right to access their personal data if:

- The processing of personal data, including personal data obtained as a result of operational-investigative, counterintelligence, and intelligence activities, is carried out for the purposes of national defense, state security, and law enforcement;
- The processing of personal data is carried out by bodies that detained the personal data subject on suspicion of committing a crime or brought charges against the personal data subject in a criminal case, or applied a measure of restraint to the personal data subject before charges were brought, except for cases provided by the criminal procedure legislation of the Russian Federation where the suspect or accused is allowed to familiarize themselves with such personal data;
- The provision of personal data violates the constitutional rights and freedoms of other persons.

6.1.6. Ensure the storage and protection of the Guest's personal data from unlawful use or loss.
6.1.7. In case of detection of inaccurate personal data or unlawful actions by the Operator with them, upon request or inquiry of the personal data subject or their legal representative, or an authorized body for the protection of personal data subjects' rights, the Operator is obliged to block the personal data relating to the respective personal data subject from the moment of such request or inquiry for the duration of the verification.
6.1.8. In case the fact of inaccuracy of personal data is confirmed, the Operator, based on documents provided by the personal data subject or their legal representative, or an authorized body for the protection of personal data subjects' rights, or other necessary documents, is obliged to clarify the personal data and unblock them.
6.1.9. In case of detection of unlawful actions with personal data, the Operator, within a period not exceeding three working days from the date of such detection, is obliged to eliminate the committed violations. If it is impossible to eliminate the committed violations, the Operator, within a period not exceeding three working days from the date of detection of the unlawfulness of actions with personal data, is obliged to destroy the personal data. The Operator is obliged to notify the personal data subject or their legal representative of the elimination of committed violations or the destruction of personal data, and in cases where the request or inquiry was sent by an authorized body for the protection of personal data subjects' rights, also notify that body.

7. Rights of the Guest

7.1. The Guest has the right to:

- Access information about themselves, including information confirming the fact of personal data processing, as well as the purpose of such processing; the methods of personal data processing used by the Hotel; information about persons who have access to personal data or to whom such access may be granted; the list of personal data processed and the source of their receipt, the terms of personal data processing, including their storage periods; information about what legal consequences the processing of their personal data may entail for

the Guest;
- Determine the forms and methods of processing their personal data;
- Restrict the methods and forms of personal data processing;
- Prohibit the dissemination of personal data without their consent;
- Change, clarify, destroy information about themselves;
- Appeal against unlawful actions or inactions concerning personal data processing and receive appropriate compensation through judicial procedure.

7.2. The Guest may contact the Operator at any time to change (update, supplement) their provided personal information or part thereof, or to delete their personal information from the database of the Operator and its branches, by sending a corresponding written statement to the Operator by registered mail with acknowledgement of receipt to the address: 129110 Moscow, Suvorovskaya Square, building 2, structure 3.

8. Confidentiality of Guests' Personal Data

8.1. Information about Guests' personal data is confidential.
8.2. The Hotel ensures the confidentiality of personal data and is obliged not to allow their dissemination to third parties without the Guests' consent or other lawful basis.
8.3. Persons who have access to Guests' personal data are obliged to observe the confidentiality regime; they must be warned about the need to maintain secrecy. In connection with the confidentiality regime of personal information, appropriate security measures must be provided to protect data from accidental or unauthorized destruction, accidental loss, unauthorized access, alteration, or dissemination.
8.4. All confidentiality measures for the collection, processing, and storage of Guests' personal data apply to all information carriers, both paper and automated.
8.5. The confidentiality regime for personal data is lifted in cases of anonymization or their inclusion in publicly available sources of personal data, unless otherwise provided by law.

9. Liability for Violation of Norms Regulating the Processing of Guests' Personal Data

9.1. The Hotel is responsible for the personal information in its possession and assigns personal responsibility to employees for observing the established confidentiality regime.
9.2. Every employee who receives a document containing Guests' personal data for work bears sole responsibility for the security of the carrier and the confidentiality of the information.

9.3. Any person may lodge a complaint with a Hotel employee about a violation of this Regulation. Complaints and statements regarding compliance with data processing requirements are considered within three days from the date of receipt.
9.4. Hotel employees are obliged to ensure the proper consideration of Guests' inquiries, statements, and complaints, as well as to facilitate the fulfillment of requirements of competent authorities.
9.5. Persons guilty of violating norms regulating the obtaining, processing, and protection of Guests' personal data bear disciplinary, administrative, civil, or criminal liability in accordance with federal laws.

10. Final Provisions

10.1. This Regulation is an internal document of JSC "Hotel Complex "Slavyanka" and is subject to posting on the official website of JSC "Hotel Complex "Slavyanka" - www.slavhotels.ru, as well as on

the websites of its branches (Hotels).
10.2. Control over the implementation of the requirements of this Regulation is carried out by those responsible for ensuring the security of personal data of JSC "Hotel Complex "Slavyanka".
10.3. Appendices to the Regulation are:
10.3.1. Registration Card Form.
10.3.2. User Agreement (for posting on Websites).

User Agreement

By agreeing to the terms of this user agreement, you give your consent to the collection, systematization, accumulation, storage, clarification (updating, modification), use, transfer to the Hotel, anonymization, and destruction of your personal data: surname, first name, patronymic, email address, phone number, citizenship. The specified personal data is requested for the purpose of providing the Guest with the requested services and responding to their inquiries. This data is displayed in responses to inquiries, accounting and reporting documentation, and the voucher. Data such as the email address are used to obtain feedback on the quality of the Hotel's service. This consent is provided by the Guest for the performance of any actions regarding personal data not contradicting the legislation of the Russian Federation, aimed at achieving the goals specified in the user agreement, including online booking by the client of the chosen Hotel (if it is done via a feedback form), compiling reporting and accounting documentation, and receiving feedback on the quality of Hotel services.
In case promotional and marketing materials are provided to the Guest, they are also given the opportunity to opt-out of receiving such materials in the future.
By using the Websites of JSC "Hotel Complex "Slavyanka", including the websites of its branches, placing an order, sending an inquiry through the specified Websites, you agree to the text of this agreement. In case of disagreement with any provisions of this document, it is recommended to stop using this Website. Continued use of the Website is unequivocally regarded as acceptance of all terms of this agreement.