

## Regulations On confidentiality provisions and handling of Customers' personal data in the Ring Premier Hotel

### 1. General provisions

1.1. The present Regulations are governed by the Constitution of the Russian Federation, the Federal Law «On Information, Information Technologies and Protection of Information» N 149 -FZ dated 27.07.2006 , the Federal Law «On Personal Data» N 152-FZ dated 27.07.2006 and other regulatory and legal acts.

#### 1.2. Key terms used in the Regulations:

Hotel - an organization that provides hotel services to the client;

Client (Customer) - an individual consumer of hotel services, the data subject;

Hotel services – actions Hotel undertakes to accommodate Clients within its facilities, as well as other activities related to boarding and lodging, which include basic and additional services provided to Customers;

Personal data - information stored in any format relating to an identified or identifiable on the basis of such information individual (the subject of personal data), which by itself or in combination with other information available to the Hotel, allows the identification of the Customer's Identity;

Processing of personal data - actions (operations) with personal data, including data collection, classification, accumulation, storage, adjustment (updating, changing), usage, distribution (including transfer), depersonalization, blocking and destruction of personal data;

Dissemination of personal data - actions aimed at the transfer of personal data to a specified community (transfer of personal data) or at disclosing personal data to the general public, including publication of personal data in the media and telecommunications networks or the provision of access to personal data otherwise;

Use of personal data - actions (operations) with personal data, committed by operator in order to make decisions or take other actions that generate legal consequences for the personal data's subject or other persons, or otherwise affect the rights and freedoms of the data subject or other persons;

Confidentiality of personal data – requirement obligatory to comply with for the operator or whoever gained access to the personal data to prevent disclosure of private information without the consent of the subject of personal data or the presence of any other legal grounds.

1.3. These Regulations shall govern the processing of personal data of the Client for whom the Hotel provides a full range of reception and accommodation within its facilities.

1.4. The aim of these Regulations is to ensure safeguarding of the rights and freedoms of man and citizen while processing their personal data.

1.5. Personal data is processed for the purpose of execution of the Contract, for the provision of services of accommodation or temporary accommodation, one side of which is the Client. Hotel collects data only to the extent necessary to attain the stated objectives.

1.6. Personal data cannot be used for purposes of causing material and moral damage to citizens, or leading to difficulty in realizing the rights and freedoms of citizens of the Russian Federation.

1.7. These Regulations are approved by the CEO and are mandatory for all employees with access to personal data of the Client.

## 2. Composition and preparation of Clients' personal data

2.1. Personal data which Hotel collects and processes include:

Personal data (name, first name, date, month, year of birth, etc.);

Passport data;

Registration address;

Residence;

Contact telephone number;

E-mail address;

Job data;

2.2. Reception personnel obtain personal data directly from the Client.

## 3. Handling and storage of Client's personal information

3.1. Processing of personal data on behalf of Client consists in getting, organizing, accumulating, storing, (updating, changing), using, disseminating, depersonalizing, blocking, annihilating and protecting against unauthorized access to personal data of Clients.

3.2. Customer's consent to processing of personal data is not required, since the processing of personal data is carried out in order to fulfill the Contract, one side of which is the subject of personal data - Client.

3.3. Customer's consent to the processing of personal data is required in the case of providing their personal data over the data specified in paragraph 2.1. hereof. (Appendix № 1 to these Regulations).

3.4. Mixed type of processing Client's data is exercised by Hotel.

3.5. Hotel will allow access to Client's personal data only to staff committed to work with personal data, who have signed a confidentiality agreement on handling Client's personal data.

3.6. List of Hotel's employees with access to Customers' personal data is determined by the order of the CEO.

3.7. Customers' personal data are stored on paper at the Reception

3.8. Customers' personal data will be electronically stored in Hotel's local computer network, in electronic folders and files in the personal computers of Chief of Reception as well as personnel admitted to the processing of Client's personal data.

## 4. Usage and transfer of personal data to the Client

4.1. Hotel will not make use of personal data for the purposes other than specified in the Agreement between the Client and the Hotel, in particular, to provide services for accommodation or temporary accommodation, as well as rendering additional services.

4.2. When transferring Client's personal data, Hotel shall comply with the following requirements:

4.2.1. Warn third-party persons receiving personal data about Customers that these data can be used only for the purposes for which they are communicated, and require these individuals should confirm that this rule is respected. Those receiving the Clients' personal data are obliged to respect confidentiality. This provision does not apply in the case of depersonalization and personal data against publicly available data.

4.2.2. Allow access to Clients' personal data only to specially authorized persons, said persons shall be entitled to receiving only the personal information they need to perform specific functions.

4.2.3. The cross-border transfer of personal data shall be implemented only after Hotel has made sure the foreign country to which the transfer is meant to be forwarded, provides adequate protection of human subjects' personal data.

4.2.4. Cross-border transfer of personal data to countries which do not safeguard subjects' personal data can be accessed in the following cases:

Client's expressed consent in writing;

Cases stipulated by international treaties of the Russian Federation on the issuance of visas, 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;

Cases specified by federal law, if necessary, to protect the foundations of the constitutional system of the Russian Federation, as well as national defense and security;

Fulfillment of the Contract to which the subject of personal data is one of the parties;

Protection of life, health and other vital interests of the data subject or other persons in case of failure to obtain the written consent of the subject of personal data.

4.3. Hotel shall not allow answering questions related to the transfer of information containing personal data, by phone or fax.

4.4. Hotel has the right to share or transfer the personal data of Customer to third parties in the following cases:

Such disclosure is required to comply with the law or perform a judicial act;

To assist in the investigations carried out by law enforcement or other government agencies;

To protect the legitimate rights of the Client and Hotel.

5. Protection of personal data from unauthorized access:

5.1. The Hotel is obliged to take the necessary technical and organizational measures while processing personal data to protect Client's personal data against unauthorized or accidental access, destruction, modification, blocking, copying, disseminating personal data, as well as other illegal actions.

5.2. For efficient safeguarding of personal information Hotel will act as described below:

5.2.1. Comply with the procedure for obtaining, recording and storing of Client's personal data;

5.2.2. Make use of technical means of protection, alarm systems;

5.2.3. Sign NDA on Client's personal data with all the staff associated with acquisition, processing and protecting of Client's personal data;

5.2.4. Announce employees subject to disciplinary responsibility for the cases of violations of rules governing the receipt, processing and protecting of personal data of the Client.

5.3. Access to Client's personal data by Hotel employees without a duly executed procedure is prohibited.

5.4. Documents containing Clients' personal information are stored on the premises of the Reception, the latter providing protection from unauthorized access.

5.5. Protection of access to electronic databases containing personal data of Customers is maintained via:

The use of licensed software to prevent unauthorized third-party access to personal data of Clients;

Password system. Passwords are set by the system administrator and reported individually to employees who have access to Clients' personal data;

5.6. Copying and making extracts from Client's personal data is permitted solely for business purposes with the written permission of the Chief.

## 6. Hotel's responsibilities

6.1. The Hotel is obliged to:

6.1.1 Process Client's personal data only for the purpose of providing legal services.

6.1.2 Obtain personal data directly from the Customer. If the Customer's personal data can be obtained only from a third party, the Client must be notified of this fact in advance, and a written consent will be demanded to confirm the Client's consent. Hotel's employees must inform the Customer of purposes, the expected sources and methods of obtaining personal data, as well as of the nature of the personal data to be received and the consequences of failure to provide written consent on the part of Client to obtain it.

6.1.3. Refrain from eliciting and processing personal data of the Customer regarding their racial or ethnic origin, political opinions, religious or philosophical beliefs, health, sexual life, except in cases provided by law.

6.1.4. Provide access to the Client or their legal representative to personal data at the address or on receipt of the request containing the number of the basic identity document of the Client or his legal representative, the date of issue of the document and the issuing authority and the handwritten signature of the Client or his legal representative. The request may be submitted in electronic form and signed by electronic signature in accordance with the legislation of the Russian Federation. Information

about the availability of personal data should be provided to the Client in an accessible form, and it should not contain personal data relating to other subjects of personal data.

6.1.5. To restrict Customer's right to access their personal data if:

the processing of personal data , including personal data obtained as a result of operational and investigative, counterintelligence and intelligence activities carried out with a view to national defense, national security and law enforcement;

the processing of personal data is being carried out by bodies detaining the subject of personal data on suspicion of committing a crime or arraigning the subject of personal data on a charge of a criminal case, or applying to the subject of personal data preventive measure before arraignment, except as provided by the criminal procedural legislation of the Russian Federation for the cases where familiarization of the suspect or the accused with such personal data is permitted;

The provision of personal data violates the constitutional rights and freedoms of others.

6.1.6. Provide storage and protection of personal data of the Customer from unauthorized use or loss or damage.

6.1.7. In cases of inaccurate personal data, or misconduct on the part of operator when handling them, or on request of the personal data subject or his legal representative or request of the authorized body for the protection of human rights of subjects of personal data, the operator is obliged to implement blocking of personal data related to the corresponding subject of personal data, since the moment of such request or receiving a written request for the inspection period.

6.1.8. In the case of confirmed unreliability of personal data, the operator shall specify the personal data and remove their blocking on the basis of documents submitted by the personal data subject or his legal representative or the authorized body for the protection of human subjects of personal data, or other required documents.

6.1.9. In the event of identification of illegal actions involving personal data, operator is to eliminate the violations within a period not exceeding three working days from the date of detection. If elimination of the violations proves impossible, the operator must destroy personal data within a period not exceeding three working days from the date of detection of mismanaging personal data. The operator must notify the data subject or his legal representative of having eliminated the violation or destruction of personal data, and if the appeal or request had been sent by the authorized body on protecting the rights of personal data subjects, notify them as well.

## 7. The rights of the Client

7.1. The client has the right to:

seek access to information about themselves, including that confirming the facts of processing their personal data and the purpose of such processing; manner of handling personal data used by the Hotel; information about persons who have access to their personal data or who may be granted such access; list of personal data being processed and their sources, terms of processing personal data, including terms of their storage as well as information about legal consequences for the Client after processing of information has taken place;

determining the forms and methods of processing their personal data;

limiting the methods and forms of personal data processing;

a ban on dissemination of their personal data without their expressed consent;

changing, updating, destructing of information about themselves;

appeal against wrongful acts or negligence of personal data processing as well as adequate compensation in court.

## 8. Confidentiality of Clients' personal data

8.1. Information about Clients' personal data is confidential.

8.2. The Hotel provides confidentiality of Clients' personal data and maintains staff's personal responsibility to prevent their distribution to third parties without the consent of the Client, or the availability of other legal grounds.

8.3. Persons having access to Clients' personal data are obliged to respect the regime of confidentiality; they should be alerted about the need to observe secrecy. In this connection, privacy of personal information must be provided for via appropriate security measures to protect data from accidental or unauthorized destruction, accidental loss of, unauthorized access, alteration or dissemination.

8.4. All measures of confidentiality at all time of collecting, processing and storing of personal data apply to all Clients' types of documents: on paper as well as in digital format.

8.5. The mode of confidentiality of personal data handling is removed in cases of depersonalization or their inclusion into the common sources of public data, unless otherwise specified by law.

## 9. Responsibility for violation of rules governing the processing of Client's personal data

9.1. The Hotel is responsible for Client's personal information that is at its disposal; it shall impose personal liability of employees over the maintenance of confidentiality.

9.2. Every employee receiving Client's document which contains their personal data shall bear sole responsibility for the safety and confidentiality of the information carrier.

9.3. Any Client may apply to the Hotel staff about the violation of these Regulations. Complaints and allegations concerning data compliance are considered within three days of their receipt.

9.4. Hotel staff is obliged to ensure consideration of requests, applications and complaints of Customers at an appropriate level, as well as promote fulfillment of requirements of the competent authorities.

9.5. Persons found guilty of violating the rules governing receipt, processing and protection of Clients' personal data are subject to disciplinary, administrative, civil or criminal liability in accordance with federal laws.