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## PRIVACY POLICY OF THE IMRUS HOTEL MOSCOW

Moscow

December 06, 2022

The Hotel adheres to the Privacy Policy (Personal Data Processing Policy), developed in accordance with the Law 152-FZ of July 27, 2006. and approved by the order of the Operations Manager of the Management Company LLC Garantiya M No. 15/201 dated February 1, 2019. This Personal Data Privacy Policy (hereinafter referred to as the Privacy Policy) applies to all information that the Imrus Hotel (hereinafter referred to as the Hotel), located on the imrushotel.ru domain name, can receive about the Consumer of hotel services while using the Site Hotel, programs and products of the Hotel.

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### 1. DEFINITION OF TERMS

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#### 1.1 The following terms are used in this Privacy Policy:

1.1.1. "Hotel Administration" (hereinafter referred to as the "Administration") - authorized site management employees acting on behalf of the Hotel, who organize and (or) process personal data, and also determine the purposes of processing personal data, the composition of personal data to be processed, actions (operations) performed with personal data.

1.1.2. "Personal data" - any information relating directly or indirectly to a specific or identifiable natural person (subject of personal data).

1.1.3. "Processing of personal data" - any action (operation) or a set of actions (operations) performed with or without the use of automation tools, with personal data, including collection, recording, systematization, accumulation, storage, clarification (updating, changing) , extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data.

1.1.4. "Confidentiality of personal data" - a requirement that the Hotel or another person who has access to personal data must comply with the requirement not to allow their distribution without the consent of the subject of personal data or other legal grounds.

1.1.5. "Hotel Website User" (hereinafter referred to as the "User") is a person who has access to the Website via the Internet and uses the Hotel Website.

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### 2. GENERAL CONDITIONS

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2.1. The User's use of the Hotel's Website means acceptance of this Privacy Policy and the terms of processing of the User's personal data.

2.2. In case of disagreement with the terms of the Privacy Policy, the User must stop using the Hotel Website.

2.3. This Privacy Policy applies only to the Hotel Website. The Hotel does not control and is not responsible for the websites of third parties, to which the User can follow the links available on the Hotel Website.

2.4. The Hotel Administration does not verify the accuracy of personal data provided by the User of the Hotel Website.

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### 3. SUBJECT OF THE PRIVACY POLICY

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3.1. This Privacy Policy establishes the obligations of the Hotel Administration to not disclose and ensure the confidentiality of personal data that the User provides at the request of the Hotel Administration when registering on the Hotel Website or when placing an order for the purchase of a service.

**3.2. Personal data authorized for processing under this Privacy Policy is provided by the User by filling out the registration form on the Hotel Website in the "Booking" section and includes the following information:**

3.2.1. Surname, name, patronymic of the User.

3.2.2. Contact phone of the User.

3.2.3. Email address (e-mail).

3.2.4. Service period, room category, number of guests, etc.

3.3. The Hotel protects the User's data.

3.4. Any other personal information not specified above is subject to secure storage and non-distribution.

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## 4. PURPOSE OF COLLECTING USER'S PERSONAL INFORMATION

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### 4.1. The Hotel Administration can use the User's personal data for the following purposes:

- 4.1.1. identification of the User registered on the website for registration of accommodation services or other services and (or) conclusion of the Agreement for the provision of hotel services;
- 4.1.2. providing the User with access to personalized resources of the Hotel Website;
- 4.1.3. establishing feedback with the User, including sending notifications, requests regarding the provision of accommodation services or other services, processing requests and applications from the User;
- 4.1.4. confirmation of the accuracy and completeness of personal data provided by the User;
- 4.1.5. notification of the Website User about booking confirmation;
- 4.1.6. processing and receiving payments, confirming tax or tax benefits, contesting a payment and other financial transactions;
- 4.1.7. providing the User, with his consent, with special offers, information on prices, newsletters and other information on behalf of the Hotel;
- 4.1.8. carrying out advertising activities with the consent of the User.
- 4.1.9. implementation of visa support upon request and with the consent of the User.

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## 5. METHODS AND TERMS OF PROCESSING PERSONAL INFORMATION

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- 5.1. The processing of the User's personal data is carried out within three working days, in any legal way, including in personal data information systems using automation tools or without using such tools.
- 5.2. The User agrees that the Hotel Administration has the right to transfer personal data to third parties, in particular, courier services, postal organizations, telecommunication operators, public services, solely for the purpose of fulfilling obligations to provide services.
- 5.3. The User's personal data may be transferred to the authorized state authorities of the Russian Federation only on the grounds and in the manner established by the legislation of the Russian Federation.
- 5.4. In case of loss or disclosure of personal data, the Hotel Administration informs the User about the loss or disclosure of personal data.
- 5.5. The Hotel Administration takes the necessary organizational and technical measures to protect the User's personal information from unauthorized or accidental access, destruction, modification, blocking, copying, distribution, as well as from other illegal actions of third parties.
- 5.6. The Hotel Administration, together with the User, takes all necessary measures to prevent losses or other negative consequences caused by the loss or disclosure of the User's personal data.

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## 6. DUTIES OF THE PARTIES

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### 6.1. The User is obliged:

- 6.1.1. provide information about personal data necessary to use the Hotel Website;
- 6.1.2. update, supplement the provided information about personal data in case of changes in this information.

### 6.2. The Hotel Administration is obliged to:

- 6.2.1. use the information received solely for the purposes specified in clause 4 of this Privacy Policy;
- 6.2.2. ensure the storage of confidential information in secret, not to disclose without the prior written permission of the User, and not to sell, exchange, publish, or disclose in other possible ways the transferred personal data of the User;
- 6.2.3. take precautions to protect the confidentiality of the User's personal data in accordance with the procedure usually used to protect this kind of information in existing business transactions;
- 6.2.4. to block personal data relating to the relevant User from the moment of the request or request of the User or his legal representative or authorized body for the protection of the rights of subjects of personal data for the period of verification, in case of revealing false personal data or illegal actions.

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## 7. RESPONSIBILITIES OF THE PARTIES

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7.1. The Hotel Administration, which has not fulfilled its obligations, is liable for losses incurred by the User in connection with the unlawful use of personal data, in accordance with the legislation of the Russian Federation.

### 7.2. In case of loss or disclosure of Confidential Information, the Hotel Administration is not responsible if this confidential information:

- 7.2.1. became public domain before its loss or disclosure;
- 7.2.2. was received from a third party prior to its receipt by the Hotel Administration;
- 7.2.3. was disclosed with the consent of the User.

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## **8. DISPUTES**

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- 8.1. Before going to court with a claim for disputes arising from the relationship between the User of the Hotel Website and the Hotel Administration, it is mandatory to file a claim (a written proposal for a voluntary settlement of the dispute).
- 8.2. The recipient of the claim, within 30 calendar days from the date of receipt of the claim, notifies the claimant in writing of the results of the consideration of the claim.
- 8.3. If an agreement is not reached, the dispute will be referred to the judicial authority in accordance with the current legislation of the Russian Federation.
- 8.4. The current legislation of the Russian Federation applies to this Privacy Policy and the relationship between the User and the Hotel Administration.

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## **9. ADDITIONAL TERMS**

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- 9.1. The Hotel Administration has the right to make changes to this Privacy Policy without the consent of the User.
- 9.2. The new Privacy Policy comes into force from the moment it is posted on the Hotel Website, unless otherwise provided by the new edition of the Privacy Policy.
- 9.3. All suggestions or questions regarding this Privacy Policy should be reported to the Hotel Administration.
- 9.4. The current Privacy Policy is posted on the page at <https://imrushotel.ru>.