

# Privacy policy

**APPROVED**

**Director General**

**Limited Liability Company “Garden Ring Hotel”**

\_\_\_\_\_ **A.V. Filatov**

**August 2, 2017**

**place of seal**

## **POLICY OF PERSONAL DATA PROCESSING AT “Garden Ring Hotel” LLC.**

### **1. General Provisions**

- 1.1. The Policy regarding the personal data processing (hereinafter referred to as the Policy) is aimed at protecting the rights and freedoms of private individuals whose personal data are processed by the Limited Liability Company “Garden Ring Hotel” (hereinafter referred to as the «Operator»).
- 1.2. The Policy was developed in accordance with Clause 2 Part 1, Art. 18.1. of the Federal Law of July 27, 2006 No. 152-FZ “On Personal Data” (hereinafter referred to as the Federal Law “On Personal Data”).
- 1.3. The Policy contains information to be disclosed in accordance with Part 1 of Art. 14 of the Federal Law “On Personal Data”, and is a public document.

### **2. Information about the Operator**

- 2.1. The Operator conducts its activities at the following address: Moscow, Prospect Mira, 14, bld. 2.
- 2.2. The Chief Auditor Gennadiy Pavlovich Opatskiy (phone +7 (495) 988-34-60) was appointed responsible for organization of personal data processing.
- 2.3. The database with the information containing personal data of citizens of the Russian Federation is located at: Moscow, Prospect Mira, 14, bld. 2.

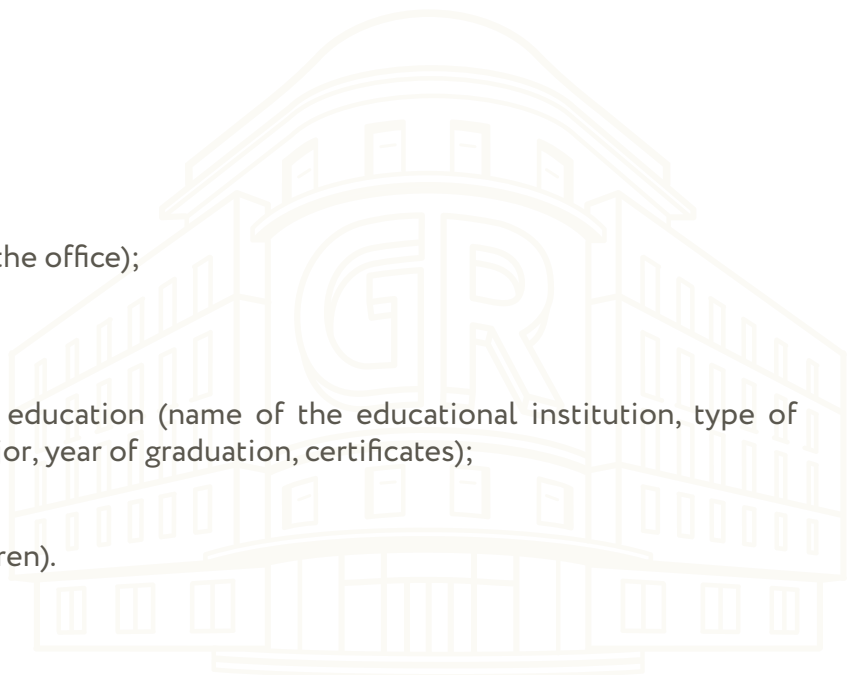
### **3. Information on Personal Data Processing**

- 3.1. The Operator performs personal data processing on a legal and fair basis for the performance of the entrusted by the law functions, powers and duties, exercise of rights and legal interests of the Operator, employees of the Operator and third parties.
- 3.2. The Operator receives personal data directly from the subjects of personal data.
- 3.3. The Operator processes personal data in automated and non-automated ways, using computer facilities and without usage of such means.
- 3.4. Personal data processing activities include collection, recording, systematization, accumulation, storage, improvement (updating, modification), extraction, use, transmission (distribution, provision, access), depersonalization, blocking, deleting and destroying.
- 3.5. Databases of information containing personal data of citizens of the Russian Federation are located on the territory of the Russian Federation.

## 4. Processing Personal Data of Employees

- 4.1. The Operator processes personal data of the Operator's employees within the framework of legal relations foreseen by the Labor Code of the Russian Federation of December 30, 2001 No. 197-FZ (hereinafter referred to as the LC RF), including Chapter 14 of the Labor Code related to the protection of personal data of employees.
- 4.2. The Operator processes personal data of employees for the purpose of executing labor contracts, compliance with the legislation of the Russian Federation, as well as with the aim of:
  - keeping personnel records;
  - keeping accounting records;
  - exercising functions, powers and duties imposed on the Operator by the legislation of the Russian Federation, including provision of personal data to the state authorities, the Pension Fund of the Russian Federation, the Social Insurance Fund of the Russian Federation, the Federal Mandatory Medical Insurance Fund, and other state authorities;
  - complying with the standards and requirements for labor protection and personal safety of the employees of the Hotel "Garden Ring", and property safety;
  - controlling the quantity and quality of the work performed;
  - providing privileges and compensations foreseen by the legislation of the Russian Federation;
  - opening personal bank accounts of employees of the Limited Liability Company "Hotel "Garden Ring" for wiring wages;
  - providing access control to the territory of the Operator;
  - organizing training of employees of the Limited Liability Company "Garden Ring Hotel";
  - posting on the website, in internal directories, address books of the organization.
- 4.3. The Operator does not take decisions affecting the interests of employees based on their personal data received electronically or exclusively as a result of automated processing.
- 4.4. The Operator protects personal data of employees at the own expense in the manner established by the Labor Code of the Russian Federation, the Federal Law "On Personal Data" and other federal laws.
- 4.5. The operator familiarizes workers and their representatives with signed acknowledgement with documents that establish the procedure for processing personal data of employees, as well as their rights and responsibilities in this area.
- 4.6. The Operator allows access to the personal data of employees only to those people who are authorized to receive only those data that are necessary for the performance of their functions.
- 4.7. The Operator receives all the personal data of employees only from them. If the data of the employee can only be obtained from a third party, the Operator shall notify the employee in advance and receive his/her written consent. The Operator informs the employee about the aims, sources, methods of obtaining, as well as the nature of the consequences of the employee's denial to give written consent to receive them.
- 4.8. The Operator processes personal data of employees with their written consent provided for the term of the labour contract.
- 4.9. The Operator processes personal data of employees during the term of the labour contract. The Operator processes the personal data of the laid-off employees within the period established by Clause 5, Part 3 of Art. 24 of the first part of the Tax Code of the Russian Federation of July 31, 1998 No. 146-FZ, Part 1 of Art. 29 of the Federal Law "On Accounting" of December 6, 2011 No. 402-FZ and other normative legal acts.

- 4.10. The Operator can process special categories of personal data of employees (information on the state of health related to the possibility of performing labor functions) on the basis of Clause 2.3 of Part 2 of Art. 10 of the Federal Law "On Personal Data".
- 4.11. The Operator does not process biometric personal data of employees.
- 4.12. The Operator does not receive data on the membership of employees in public associations or their trade union activities, except for cases foreseen by the LC RF or other federal laws.
- 4.13. The operator processes the following personal data of employees:
- first, second and last names;
  - type, series and number of the document identifying the person;
  - date of issue of the identity document and information about the issuing authority;
  - year of birth;
  - month of birth;
  - date of birth;
  - place of birth;
  - address;
  - taxpayer identification number;
  - number of insurance certificate of the state pension insurance;
  - profession;
  - income;
  - insurance premiums to the mandatory pension insurance;
  - insurance premiums for mandatory medical insurance;
  - tax deductions;
  - preferential payments;
  - retirement;
  - post;
  - duration of employment;
  - contact phone number;
  - temporary disability;
  - family status;
  - education;
  - information on military registration;
  - data on social benefits;
  - e-mail address (public information in the office);
  - citizenship;
  - foreign language skills;
  - information on basic and additional education (name of the educational institution, type of document and details, qualification, major, year of graduation, certificates);
  - information on previous work places;
  - information on family members (children).



- 4.14. The Operator does not disclose the employee's personal data to a third party without his/her written consent, except for the cases when it is necessary to prevent a threat to the life and health of the employee, as well as in other cases foreseen by the LC RF, the Federal Law "On Personal Data" or other federal laws.
- 4.15. The Operator does not disclose the employee's personal data for commercial purposes without his/her written consent.
- 4.16. The Operator transfers personal data of employees to their representatives in the manner established by the RF LC, the Federal Law "On Personal Data" and other federal laws, and restricts this information to only those data that are necessary for the representatives to perform their functions.
- 4.17. The Operator warns the persons who receive personal data of the employee that these data can only be used for the purposes for which they are communicated, and requires these persons to confirm that this rule is observed.
- 4.18. In accordance with the procedure established by law and in accordance with Art. 7 of the Federal Law "On Personal Data" in order to achieve the purposes of personal data processing and with the consent of employees, the Operator provides personal data of employees or entrusts them for processing by the following entities:
- State bodies (Pension Fund of the Russian Federation, Federal Tax Service of Russia, Social Insurance Fund of the Russian Federation and others);
  - Bank (within salary project)
- 4.19. The employee can obtain free access to the information about his/her personal data and about the processing of these data. The employee may receive a copy of any record containing his/her personal data, except for cases foreseen by the federal law.
- 4.20. The employee can access medical records stating his/her state of health with the help of a medical worker of his/her choice.
- 4.21. The employee can identify a representative to protect his/her personal data.
- 4.22. The employee may request exclusion or correction of his/her incorrect or incomplete personal data, as well as the data processed in violation of the requirements of the Labor Code of the Russian Federation, the Federal Law "On Personal Data" or other federal law. If the Operator refuses to exclude or correct the personal data of the employee, he/she can declare disagreement in writing and justify such disagreement. The employee can supplement the personal data of the evaluation matter with the statement expressing his/her own point of view.
- 4.23. The employee may request to notify all persons who had previously been informed of the incorrect or incomplete personal data about all exceptions, corrections or additions made in them.
- 4.24. An employee may appeal to the court any wrongful acts or omissions by the Operator when processing and protecting his/her personal data.

## **5. Processing of the Clients' Personal Data**

- 5.1. The Operator processes personal data of clients within the scope of legal relationships with the Operator regulated by Part 2 of the Civil Code of the Russian Federation of January 26, 1996 No. 14-FZ (hereinafter referred to as "clients").
- 5.2. The Operator processes personal data of clients in order to comply with the norms of the legislation of the Russian Federation, as well as with the aim of:
- concluding and fulfilling obligations under the contracts with clients;
  - carrying out the types of activities foreseen in the founding documents of the Limited Liability Company "Garden Ring Hotel";

- informing about new products, special promotions and offers;
  - making discount cards.
- 5.3. The Operator processes the personal data of the clients with their consent, provided for the duration of the contracts concluded with them. In cases foreseen by the Federal Law "On Personal Data" the consent is provided in a written form. In other cases, the consent is deemed to be received at the conclusion of the contract or in the performance of conclusive acts.
- 5.4. The Operator processes the personal data of the clients during the validity periods of the contracts concluded with them. The Operator can process the personal data of the clients after the expiration of the validity of the contracts concluded with them within the period established by Clause 5, Part 3 of Art. 24 of the first part of Tax Code of the Russian Federation, Part 1 of Art. 29 of the Federal Law "On Accounting" and other normative legal acts.
- 5.5. The Operator processes the following clients' personal data:
- first, second and last names;
  - type, series and number of the document identifying the person;
  - date of issue of the identity document and information about the issuing authority;
  - year of birth;
  - month of birth;
  - date of birth;
  - information on rendered services;
  - address (if available);
  - phone number (if available);
  - e-mail address (if available).
- 5.6. In order to achieve the purposes of personal data processing and with the consent of the client, the Operator provides personal data or entrusts them for processing by the following entities:
- Administration for Migration Issues of the Ministry of Internal Affairs for Moscow;
  - Administration for Migration Issues of the Ministry of Internal Affairs for Meshchansky district of Moscow.

## **6. Information on the Security of Personal Data**

- 6.1. The Operator appoints the person responsible for organizing personal data processing for the performance of the duties foreseen by the Federal Law "On Personal Data" and the normative legal acts adopted in accordance with it.
- 6.2. The Operator applies a set of legal, organizational and technical measures to ensure the security of personal data to provide confidentiality of personal data and protect them from illegal actions:
- provides unlimited access to the Policy, a copy of which is located at the address of the Operator, and can also be posted on the Operator's website (if available);
  - in compliance with the Policy, approves and enforces the document "Regulation on the personal data processing" (hereinafter referred to as the Regulations) and other local acts;
  - familiarizes employees with the provisions of legislation on personal data, as well as with the Policy and Regulations;
  - allows employees to access personal data processed in the information system of the Operator, as well as material objects only for the performance of their duties;
  - sets the rules for accessing personal data processed in the information system of the Operator,

and also provides registration and recording of all actions performed with them;

- assesses the harm that may be caused to the subjects of personal data in the event of violation of the Federal Law "On Personal Data";
- defines the threats to the security of personal data when processing them in the information system of the Operator;
- applies organizational and technical measures and uses the information protection tools necessary to achieve the established level of protection of personal data;
- detects the facts of unauthorized access to personal data and takes response measures, including the restoration of personal data modified or destroyed due to unauthorized access to them;
- assesses the effectiveness of measures taken to ensure the security of personal data prior to putting into operation the information system of the Operator;
- carries out internal control over the compliance of personal data processing with the Federal Law "On Personal Data", the regulatory legal acts adopted in accordance with it, the requirements for the protection of personal data, the Policy, the Regulations and other local acts, including control over the measures taken to ensure the security of personal data and their level of security when being processed in the information system of the Operator.

## **7. Rights of the personal data owners**

7.1. The owner of the personal data has the right:

- to receive personal data related to this owner and information regarding their processing;
- to clarify, block or destroy his/her personal data if they are incomplete, obsolete, inaccurate, illegally obtained or are not necessary for the stated purpose of the processing;
- to revoke his/her consent for personal data processing;
- to protect the rights and legitimate interests, including compensation for damages and compensation for moral harm in court;
- to appeal to the authorized body against actions or omissions of the Operator for protection of the rights of the owner of the personal data or in court.

7.2. To exercise the rights and legitimate interests, personal data owners have the right to apply to the Operator or send a request personally or with the help of a representative. The request must contain the information specified in Part 3 of Art. 14 of the Federal Law "On Personal Data".



