

APPROVED
by order of AVENUE HOTEL LLC
dated December 06, 2018, No. 14-
OBSHCH

Personal Data Processing Policy at AVENUE HOTEL LLC

Personal data - information about the facts, events and circumstances of the life of the subject of personal data, allowing to identify his identity; information required by the Organization in connection with labor relations and related to a specific employee. Personal data includes: biographical and identification data, personal characteristics, information about marital status, social status, education, skills, profession, official status, financial status, health status, and other personal data.

Personal data subject (Subject) – an employee of the Organization to whom the relevant personal data relates, as well as other personal data subjects who are not in an employment relationship with AVENUE HOTEL LLC

Processing of personal data - receiving, storing, combining, transmitting or any other use of the Subject's personal data.

Official authorized to process personal data (Authorized person) - an official of an Organization whose functional responsibilities include processing personal data.

User of personal data (User) – an official of the Organization who applies to the information system or an Authorized Person for obtaining the necessary personal data and uses them.

1. General provisions

1.1. The Personal Data Processing Policy of AVENUE HOTEL LLC (hereinafter referred to as the Policy) defines the main principles, goals, conditions and methods of processing personal data, lists of subjects and personal data processed in AVENUE HOTEL LLC, functions of AVENUE HOTEL LLC in processing personal data, rights of personal data subjects, as well as the functions implemented by the Company. in LLC "AVENUE HOTEL" requirements for the protection of personal data.

1.2. The Policy was developed taking into account the requirements of the Constitution of the Russian Federation, legislative and other regulatory legal acts of the Russian Federation in the field of personal data.

1.3. The provisions of the Policy serve as the basis for the development of local regulatory acts regulating the processing of personal data of employees of AVENUE HOTEL LLC and other personal data subjects in AVENUE HOTEL LLC.

2. Legislative and other regulatory legal acts of the Russian Federation, in accordance with which the Personal Data Processing Policy of AVENUE HOTEL LLC is determined.

2.1. Federal Law No. 152-FZ of July 27, 2006 "On Personal Data";

2.2. The Labor Code of the Russian Federation;

- 2.3. Decree of the President of the Russian Federation No. 188 of March 06, 1997 "On Approval of the List of Confidential Information";
- 2.4. Decree of the Government of the Russian Federation No. 687 of September 15, 2008 "On Approval of the Regulation on the Specifics of processing Personal Data performed without the use of automation tools";
- 2.5. Resolution of the Government of the Russian Federation No. 512 of July 06, 2008 "On Approval of Requirements for Material Carriers of Biometric Personal Data and Technologies for Storing such Data outside of Personal Data Information Systems";
- 2.6. Decree of the Government of the Russian Federation No. 1119 of November 01, 2012 "On Approval of Requirements for the Protection of Personal data when Processing Them in Personal Data Information Systems";
- 2.7. FSTEC Order No. 21 of February 18, 2013 "On approval of the Composition and Content of organizational and technical measures to ensure the security of personal data when Processing them in Personal Data Information Systems";
- 2.8. Приказ Roskomnadzor Order No. 996 of September 05, 2013 "On approval of requirements and methods for depersonalization of Personal data";
- 2.9. other regulatory legal acts of the Russian Federation and regulatory documents of authorized state authorities.

In order to implement the Policy provisions, AVENUE HOTEL LLC develops relevant local regulations and other documents, including the regulation on working with personal data of employees

of AVENUE HOTEL LLC and other local regulations and documents regulating the processing of personal data.

3. Principles and purposes of personal data processing

3.1. LLC "AVENUE HOTEL", being the operator of personal data, processes personal data of employees of LLC" AVENUE HOTEL "and other personal data subjects who are not in an employment relationship with LLC" AVENUE HOTEL".

3.2. Personal data processing in AVENUE HOTEL LLC is carried out taking into account the need to ensure the protection of the rights and freedoms of employees of AVENUE HOTEL LLC and other personal data subjects, including the protection of the right to privacy, personal and family secrets, based on the following principles:

- processing of personal data is carried out in AVENUE HOTEL LLC on a legal and fair basis;
- the processing of personal data is limited to the achievement of specific, pre-defined and legitimate purposes;
- processing of personal data that is incompatible with the purposes of personal data collection is prohibited.
- it is not allowed to combine databases containing personal data, the processing of which is carried out for purposes that are incompatible with each other;
- only personal data that meets the purposes of their processing are subject to processing;
- the content and scope of the personal data processed corresponds to the stated purposes of processing. Redundancy of the processed personal data in relation to the stated purposes of their processing is not allowed;

– when processing personal data, the accuracy of personal data, their sufficiency, and, if necessary, their relevance in relation to the purposes of personal data processing are ensured. AVENUE HOTEL LLC takes the necessary measures or ensures their adoption to delete or clarify incomplete or inaccurate personal data;

– storage of personal data is carried out in a form that makes it possible to determine the subject of personal data, no longer than the purposes of processing personal data require, unless the period of storage of personal data is established by federal law, an agreement to which the subject of personal data is a party, beneficiary or guarantor;

– the processed personal data is destroyed or depersonalized when the purposes of processing are achieved or when it is no longer necessary to achieve these goals, unless otherwise provided by federal law.

3.3. Personal data is processed by AVENUE HOTEL LLC for the following purposes:

a) ensuring compliance with the Constitution of the Russian Federation, legislative and other regulatory legal acts of the Russian Federation, and local regulatory acts of AVENUE HOTEL LLC;

б) performing the functions, powers and duties assigned by the legislation of the Russian Federation to AVENUE HOTEL LLC, including providing personal data to state authorities, the Pension Fund of the Russian Federation, the Social Insurance Fund of the Russian Federation, the Federal Compulsory Medical Insurance Fund, as well as to other state bodies;

в) regulation of labor relations with employees of AVENUE HOTEL LLC (assistance in employment, training and promotion, ensuring personal safety, monitoring the quantity and quality of work performed, ensuring the safety of property);

г) providing employees of AVENUE HOTEL LLC and their family members with additional guarantees and compensations, including non-state pension provision, voluntary medical insurance, medical care and other types of social security;

д) protection of the life, health or other vital interests of personal data subjects;

е) preparation, conclusion, execution and termination of contracts with counterparties;

ж) ensuring access and intra-facility modes at the facilities of AVENUE HOTEL LLC;

з) formation of reference materials for internal information support of the activities of AVENUE HOTEL LLC;

и) execution of judicial acts, acts of other bodies or officials subject to execution in accordance with the legislation of the Russian Federation on enforcement proceedings;

к) exercising the rights and legitimate interests of AVENUE HOTEL LLC in the framework of carrying out activities stipulated by the Charter and other local regulatory acts of AVENUE HOTEL LLC, or third parties, or achieving socially significant goals;

л) maintaining communication with users of the website of AVENUE HOTEL LLC, including for sending electronic notifications;

м) for other legitimate purposes.

4. List of entities whose personal data is processed in AVENUE HOTEL LLC

– employees of the structural divisions of AVENUE HOTEL LLC;

– other subjects of personal data (to ensure the implementation of the processing purposes specified in section 3 of the Policy).

5. List of personal data processed by AVENUE HOTEL LLC

5.1. The list of personal data processed by AVENUE HOTEL LLC is determined in accordance with the legislation of the Russian Federation and local regulations of AVENUE HOTEL LLC, taking into account the purposes of processing personal data specified in section 4 of the Policy.

5.2. AVENUE HOTEL LLC does not process special categories of personal data related to race, nationality, political views, religious or philosophical beliefs, or intimate life.

6. Functions of AVENUE HOTEL LLC when processing personal data. When processing personal data of AVENUE HOTEL LLC:

a) takes measures necessary and sufficient to ensure compliance with the requirements of the legislation of the Russian Federation and local regulations of AVENUE HOTEL LLC in the field of personal data;

б) takes legal, organizational and technical measures to protect personal data from unauthorized or accidental access to it, destruction, modification, blocking, copying, provision, dissemination of personal data, as well as from other illegal actions in relation to personal data;

в) appoints the person responsible for organizing the processing of personal data in AVENUE HOTEL LLC;

г) issues local regulations defining the procedure for working with personal data and the procedure for protecting personal data in AVENUE HOTEL LLC;

д) familiarizes employees of AVENUE HOTEL LLC who directly process personal data with the provisions of the legislation of the Russian Federation and local regulations of AVENUE HOTEL LLC in the field of personal data, including requirements for personal data protection, and trains these employees;

е) publishes or otherwise provides unrestricted access to this Policy;

ж) informs the personal data subjects or their representatives in accordance with the established procedure about the availability of personal data related to the relevant subjects, provides an opportunity to get acquainted with this personal data when applying and / or receiving requests from these personal data subjects or their representatives, unless otherwise established by the legislation of the Russian Federation;

з) stops processing and destroys personal data in cases stipulated by the legislation of the Russian Federation in the field of personal data;

и) performs other actions stipulated by the legislation of the Russian Federation in the field of personal data.

7. Terms of personal data processing in AVENUE HOTEL LLC

7.1. Personal data processing in AVENUE HOTEL LLC is carried out with the consent of the personal data subject to the processing of his / her personal data, unless otherwise provided by the legislation of the Russian Federation in the field of personal data.

7.2. AVENUE HOTEL LLC does not disclose or distribute personal data to third parties without the consent of the personal data subject, unless otherwise provided by federal law.

7.3. AVENUE HOTEL LLC has the right to entrust the processing of personal data to another person with the consent of the personal data subject on the basis of a contract concluded with this

person. The contract must contain a list of actions (operations) with personal data that will be performed by the person processing personal data, the purposes of processing, the obligation of such a person to respect the confidentiality of personal data and ensure the security of personal data during their processing, as well as requirements for the protection of processed personal data in accordance with Article 19 of the Federal Law "On Personal Data".

7.4. For the purpose of internal information support, AVENUE HOTEL LLC may create internal reference materials, which, with the written consent of the personal data subject, may include, unless otherwise provided for by the legislation of the Russian Federation, his / her last name, first name, patronymic, place of work, position, year and place of birth, address, subscriber number, e-mail address, other personal data provided by the personal data subject.

7.5. Access to personal data processed by AVENUE HOTEL LLC is allowed only to employees of AVENUE HOTEL LLC who hold positions included in the list of positions of the structural divisions of AVENUE HOTEL LLC, in the replacement of which personal data is processed.

8. List of actions with personal data and methods of processing them

8.1. AVENUE HOTEL LLC collects, records, systematizes, accumulates, stores, clarifies (updates, changes), extracts, uses, transfers (distributes, provides, accesses), depersonalizes, blocks, deletes and destroys personal data.

8.2. Personal data is processed by AVENUE HOTEL LLC in the following ways:

- automated processing of personal data;
- automated processing of personal data with or without transmission of the received information via information and telecommunication networks;
- mixed processing of personal data.

9. Rights of personal data subjects

9.1. Subjects of personal data have the right to:

a) full information about their personal data processed by AVENUE HOTEL LLC;

б) access to their personal data, including the right to receive a copy of any record containing their personal data, with the exception of cases provided for by federal law, as well as access to medical data related to them with the help of a medical specialist of their choice;

в) clarification of their personal data, their blocking or destruction if the personal data is incomplete, outdated, inaccurate, illegally obtained or not necessary for the stated purpose of processing;

г) revocation of consent to the processing of personal data; taking legal measures to protect their rights;

д) appeal against the actions or omissions of AVENUE HOTEL LLC, carried out in violation of the requirements of the legislation of the Russian Federation in the field of personal data, to the authorized body for the protection of the rights of personal data subjects or to the court;

е) exercise of other rights stipulated by the legislation of the Russian Federation.

10. Measures taken by AVENUE HOTEL LLC to ensure the fulfillment of the operator's obligations when processing personal data

10.1. Measures necessary and sufficient to ensure that AVENUE HOTEL LLC fulfills the operator's obligations under the legislation of the Russian Federation in the field of personal data include:

a) appointment of a person responsible for organizing the processing of personal data in AVENUE HOTEL LLC;

б) adoption of local regulations and other documents in the field of personal data processing and protection;

в) organizing training and conducting methodological work with employees of the structural divisions of AVENUE HOTEL LLC, who hold positions included in the list of positions of the structural divisions of AVENUE HOTEL LLC, in the replacement of which personal data is processed;

г) obtaining the consent of personal data subjects to the processing of their personal data, with the exception of cases stipulated by the legislation of the Russian Federation;

д) separation of personal data processed without the use of automation tools from other information, in particular by recording them on separate material carriers of personal data, in special sections;

е) ensuring separate storage of personal data and their physical carriers, which are processed for different purposes and which contain different categories of personal data;

ж) establishing a ban on the transfer of personal data over open communication channels, computer networks outside the controlled zone, EVSPD of AVENUE HOTEL LLC and Internet networks without applying the measures established in AVENUE HOTEL LLC to ensure the security of personal data (with the exception of publicly available and (or) depersonalized personal data);

з) storage of tangible personal data carriers in compliance with the conditions that ensure the safety of personal data and exclude unauthorized access to them;

и) implementation of internal control over the compliance of personal data processing with the Federal Law "On Personal Data" and regulatory legal acts adopted in accordance with it, requirements for personal data protection, this Policy, and local regulatory acts of AVENUE HOTEL LLC;

к) other measures provided for by the legislation of the Russian Federation in the field of personal data.

10.2. Measures to ensure the security of personal data when processing them in personal data information systems are established in accordance with the local regulatory acts of AVENUE HOTEL LLC, which regulate the issues of ensuring the security of personal data when processing them in the personal data information systems of AVENUE HOTEL LLC.

11. Monitoring compliance with the legislation of the Russian Federation and local regulations of AVENUE HOTEL LLC in the field of personal data, including requirements for personal data protection

11.1. Monitoring of compliance by the structural divisions of AVENUE HOTEL LLC with the legislation of the Russian Federation and local regulations of AVENUE HOTEL LLC in the field of personal data, including requirements for personal data protection, is carried out in order to verify the compliance of personal data processing in the structural divisions of AVENUE HOTEL LLC with the legislation of the Russian Federation and

local regulations of AVENUE HOTEL LLC "AVENUE HOTEL" in the field of personal data, including the requirements for the protection of personal data, as well as measures taken to prevent and detect violations of the legislation of the Russian Federation in the field of personal data, identify possible channels of leakage and unauthorized access to personal data, and eliminate the consequences of such violations.

11.2. Internal control over compliance by the structural divisions of AVENUE HOTEL LLC with the legislation of the Russian Federation and local regulations of AVENUE HOTEL LLC in the field of personal data, including requirements for personal data protection, is carried out by the person responsible for organizing the processing of personal data in AVENUE HOTEL LLC.

11.3. Personal responsibility for compliance with the requirements of the legislation of the Russian Federation and local regulations of AVENUE HOTEL LLC in the field of personal data in the structural divisions of AVENUE HOTEL LLC, as well as for ensuring the confidentiality and security of personal data in these divisions of AVENUE HOTEL LLC is assigned to their managers.

CONSENT TO THE PROCESSING OF PERSONAL DATA

This consent to the processing of personal data is a public offer.

When booking a room, an individual undertakes to accept (accept) this Consent to the processing of personal data (hereinafter referred to as Consent).

The User gives his consent to AVENUE HOTEL LLC (Sunflower Avenue Hotel Moscow), located at 32 Shchepkina str., building 1, Moscow, 129090 (hereinafter referred to as the Operator), to process his personal data with the following conditions:

1. This consent is given to the processing of personal data, both without the use of automation tools, and with their use.
2. Consent is given to the processing of the following personal data:
 - type of identity document.
 - series and number of the identity document of the personal data subject, information about the date of issue of the specified document and the issuing authority;
 - address of registration and address of actual residence.
 - last name, first name, patronymic;
 - contact phone numbers.
 - email addresses.
 - information about your social media accounts.
 - gender.
 - age;
 - information about purchased products and services.
 - location information.
3. Personal data that is not special or biometric
4. Personal data is not publicly available.
5. Purpose of personal data processing:
 - ensuring compliance with the Constitution of the Russian Federation, legislative and other regulatory legal acts of the Russian Federation, and local regulatory acts of AVENUE HOTEL LLC;
 - exercising the rights and legitimate interests of AVENUE HOTEL LLC in the framework of carrying out activities stipulated by the Charter and other local regulatory acts of AVENUE HOTEL LLC, or third parties, or achieving socially significant goals.
6. The basis for processing personal data is: Article 24 of the Constitution of the Russian Federation; Federal Law No. 152-FZ of 27.07.2006 "On Personal Data"; Decree of the Government of the Russian Federation No. 1085 of 09.10.2015" On Approval of the Rules for Providing Hotel Services in the Russian Federation"; this offer.
7. During the processing of personal data, the following actions will be performed:: collection; recording; systematization; accumulation; storage; refinement (updating,

modification); extraction; use; transfer (distribution, provision, access); blocking; deletion; destruction.

8. The consent comes into force from the moment of signing the guest's registration card and is valid until the individual withdraws from the validity of this Consent.

9. The consent may be revoked by the personal data subject or his representative by sending a written application to the Operator or his representative at the address indicated at the beginning of this Consent.

10. If the personal data subject or his representative withdraws consent to the processing of personal data, the Operator has the right to continue processing personal data without the consent of the personal data subject, if there are grounds specified in paragraphs 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 of 27.07.2006 "On personal data".

11. This consent is valid for the entire time until the processing of personal data specified in clauses 8 and 9 of this Consent is terminated.