

**Privacy Policy
for Processing of User Personal Data at Hotel Website www.dtarbat.ru**

1. General

1.1. This document defines the policy of PAK-PLAZA LLC (hereinafter referred to as the "Hotel") regarding the processing and security of personal data, as well as information posted on the website of DoubleTree by Hilton Moscow Arbat Hotel (hereinafter referred to as the "Hotel") at www.dtarbat.ru (hereinafter referred to as the "Website") that can be received by users while navigating through the Website and its services. Using the Website services means the User's unconditional acceptance of this Policy and the personal data processing terms and conditions set out therein; if the User does not accept these terms and conditions, the User shall refrain from using the Website services.

1.2. This Policy has been developed for the purposes of implementing the legal requirements for personal data processing and security and is aimed at ensuring the protection of human and civil rights and freedoms in the course of processing his/her personal data at the Hotel.

1.3. The provisions set out in this Policy serve as the basis for arranging all personal data processing and protection processes at the Hotel.

1.5. This Policy has been developed in compliance with the federal laws of the Russian Federation:

- Constitution of the Russian Federation;
- Federal Law No. 152-FZ dated 27 July 2006 "On Personal Data";
- Federal Law No. 132-FZ dated 24 November 1996 "On the Fundamentals of Tourism Activities in the Russian Federation";
- Rules for Providing Hotel Services in the Russian Federation approved by Decree of the Government of the Russian Federation No. 1853 dated 18 November 2020;
- Rules for Registration and De-Registration of Citizens of the Russian Federation at the Place of Stay and at the Place of Residence within the Russian Federation and the List of Persons Responsible for Receiving and Transferring to the Registration Authorities Documents for Registration and De-Registration of Citizens of the Russian Federation at the Place of Stay and at the Place of Residence within the Russian Federation approved by Decree of the Government of the Russian Federation No. 713 dated 17 July 1995;
- Federal Law No. 109-FZ dated 18 July 2006 "On Migration Registration of Foreign Nationals and Stateless Persons in the Russian Federation";
- Decree of the Government of the Russian Federation No. 9 dated 15 January 2007 "On the Procedure for Migration Registration of Foreign Nationals and Stateless Persons in the Russian Federation"; and
- other applicable federal laws and regulations of the Russian Federation defining the rules and specifics of personal data processing and related security and confidentiality.

1.6. This Policy establishes:

- personal data processing purposes;
- general personal data processing rules and principles;
- classification of personal data and personal data subjects;
- rights and obligations of personal data subjects and the Hotel in terms of personal data processing;
- personal data processing procedure.

1.7. This Policy shall be posted on a publicly accessible resource: the Hotel website at <https://dtarbat.ru/> with unrestricted access.

1.8. This Policy shall become effective upon approval.

1.9. This Policy shall be revised due to changes in the legislation of the Russian Federation regarding personal data processing and protection, based on an assessment of the relevance, adequacy, and efficiency of measures taken to ensure the security of personal data processing at the Hotel.

1.10. This Policy shall apply to actions (operations) or a set of actions (operations) performed, with or without automation tools, with personal data, including collection, recording, systematisation, accumulation, storage, clarification (updating, changing), extraction, use, transfer (distribution, provision, access to), depersonalisation, blocking, deletion, destruction of personal data.

2. Basic Terms and Definitions

Automated processing of personal data means processing of personal data using computer hardware.

Biometric personal data means information that describes the physiological and biological characteristics of a person, which can be, and is used by the processor, to establish the identity of the personal data subject.

Blocking of personal data means temporary cessation of personal data processing (except where processing is required to clarify personal data).

Personal data security means the state of security of personal data characterized by the ability of users, technical means, and information technologies to ensure the confidentiality, integrity, and availability of personal data when processed in personal data information systems.

Personal data information system means a set of personal data contained in databases, and the information technologies and technical means that ensure their processing.

Personal data confidentiality means a requirement, mandatory for the Hotel or any third parties that has access to personal data, not to allow disclosure and dissemination of personal data without the consent of the personal data subject or any other legal grounds.

Processing of personal data means any action (operation) or a set of actions (operations) performed, with or without automation tools, with personal data, including collection, recording, systematisation, accumulation, storage, clarification (updating, changing), extraction, use, transfer (distribution, provision, access to), depersonalisation, blocking, deletion, destruction of personal data.

Generally accessible personal data mean personal data which can be accessed by the general public with the consent of the personal data subject or which, in accordance with the federal laws, are not subject to confidentiality requirements.

Depersonalisation of personal data means actions which result in making it impossible, without using additional information, to identify whether personal data belong to a specific personal data subject.

Processor means any governmental authority, municipal authority, legal entity or individual that, independently or jointly with other persons, arranges and/or effects the processing of personal data, and identifies the purposes of personal data processing, the composition of personal data to be processed, and the actions (operations) performed with personal data.

Provision of personal data means actions aimed at disclosing personal data to a certain person or a specific group of people.

Personal data mean any information relating to a directly or indirectly identified or identifiable individual (personal data subject).

Special categories of personal data mean personal data relating to race, nationality, political views, religious or philosophical beliefs, health, and intimate life of the personal data subject.

Personal data subject means an individual who is directly or indirectly identified or identifiable by data.

Other information means data that cannot be used to identify an individual or that are not directly related to him/her.

Destruction of personal data means actions which result in making it impossible to restore the content of personal data in the personal data information system and/or destruction of personal data media.

3. Personal Data Processing Purposes

3.1. The Hotel processes personal data for the purposes of:

- Providing hotel and/or additional services at DoubleTree by Hilton Moscow Arbat Hotel in compliance with the Rules for Hotel Services of PAK-PLAZA LLC;
- Maintaining registration records of Russian citizens at the place of stay at the hotel, as well as registering foreign nationals and stateless persons at the place of stay at the hotel;
- Providing the personal data subject with confirmation of booking a room/rooms at DoubleTree by Hilton Moscow Arbat Hotel;
- Entering into hotel and additional services agreements at DoubleTree by Hilton Moscow Arbat Hotel with the personal data subject and further performing the same;
- Generating statistical and tax reports, including for submission to regulatory authorities of the Russian Federation;
- Providing the personal data subject with information about the services being rendered, current marketing campaigns, and new services; and
- Any other purposes not prohibited by the federal laws and international treaties of the Russian Federation.

4. Classification of Personal Data and Categories of Subjects, Personal Data Processed at the Hotel

- 4.1. Personal data include any information relating to a directly or indirectly identified or identifiable individual (personal data subject), which is processed by the Hotel to achieve the specified purposes.
- 4.2. The Hotel does not process special categories of personal data relating to race, nationality, political views, religious and philosophical beliefs, unless otherwise provided for by the laws of the Russian Federation.
- 4.3. The Hotel processes personal data of the following categories of personal data subjects:

- Individuals who are customers of the Hotel (guests) and/or legally representing the interests of customers of the Hotel, or intending to become such;
- Individuals purchasing or intending to purchase third-party parties through the Hotel provided that their personal data are included in the Hotel's automated systems in connection with the provision of hotel and/or additional services to them;
- Other individuals who have expressed their consent to the processing of their personal data by the Hotel or the processing of whose personal data is required for the Hotel to fulfil the duties, functions, or powers assigned and/or provided for by an international treaty of the Russian Federation or the laws of the Russian Federation.

5. Basic Personal Data Processing Principles

5.1. Personal data are processed at the Hotel on the basis of the following principles:

- Legality of the personal data processing purposes and methods;
- Correspondence of the personal data processing purposes to the goals predetermined and stated upon personal data collection;
- Correspondence of the composition and scope of personal data being processed, as well as the personal data processing methods to the stated processing purposes;
- Reliability of personal data and their sufficiency for the processing purposes;
- Inadmissibility of processing personal data that are excessive in relation to the purposes stated upon personal data collection;
- Inadmissibility of combining databases containing personal data which are processed for purposes incompatible with each other;
- Ensuring that personal data are not stored longer than required by the personal data processing purposes, unless the storage period for personal data is established by the federal law or agreement to which the personal data subject is a party;
- Destruction or depersonalization of personal data upon achievement of the processing purposes or if there is no longer a need for achieving these purposes, unless otherwise provided for by the laws of the Russian Federation or agreement to which the personal data subject is a party;
- Ensuring the confidentiality and security of personal data being processed.

6. Arranging Personal Data Processing

- 6.1. Personal data are processed in compliance with the principles and rules established by Federal Law No. 152-FZ dated 27 July 2006 "On Personal Data".
- 6.2. The Hotel processes personal data both with and without using automation tools.
- 6.3. The Hotel may include personal data subjects in publicly available sources of personal data, and the Hotel obtains the written consent of the subject to process his/her personal data.
- 6.4. No biometric personal data are processed at the Hotel.
- 6.5. The Hotel may carry out cross-border transfer of personal data (both to countries that provide an adequate level of personal data protection and to other countries that may not provide an adequate level of personal data protection) for the purpose of performing an agreement to which the personal data subject is a party and/or with the consent of the same.
- 6.6. No decisions that give rise to legal implications for the personal data subject or otherwise affect his/her rights and legitimate interests are made based solely on automated processing of personal data.

- 6.7. If the subject's written consent to the processing of his/her personal data is not required, the subject's consent may be given by the personal data subject or his/her representative in any form allowing to confirm the fact of its receipt.
- 6.8. The Hotel may commission the processing of personal data to another person with the consent of the personal data subject, unless otherwise provided for by federal law, under an agreement entered into with that person (hereinafter referred to as the "processor's commission"). At the same time, the Hotel shall, in the agreement, oblige the person processing personal data on behalf of the Hotel to comply with the personal data processing rules and principles provided for by this Federal Law.
- 6.9. Access to personal data processed by the Hotel may be granted to governmental authorities (including regulatory, supervisory, law enforcement, and other authorities) to the extent and in the manner set forth in the applicable laws of the Russian Federation.

6.10. Collection and Processing of Personal Information of the Website User and Other Information

In this Policy, the user's personal information means:

6.10.1. Personal information that is provided by the user about himself/herself independently upon sign-up or in the course of using the Website services. Information required for the provision of services is specifically labelled. Any other information is provided by the User at his/her discretion.

6.10.2. This Privacy Policy only applies to the Hotel Website at www.dtarbat.ru. The Website Administration does not control and is not responsible for any third-party websites that can be accessed by the user via links available on the Hotel Website.

6.10.3. The Administration may post resources of other services/websites (such as a room booking service, automated visa support service, newsletter subscription service, Hotel restaurant table reservation service, etc) on the Website. At the same time, the Website Administration is not responsible to the user for any actions by such resources, including the use of data referred to in Clause 6.10.1.

6.10.4. The above information may be used by the Website Administration without the user's consent for statistical purposes related to the Website operation, security, and optimisation.

6.10.5. In this Policy, "Other Information" means data that do not directly identify the visitor to the Hotel Website at <https://dtarbat.ru/>, but are used by the Hotel with the consent of the same. These data are pieces of information that are used by the server to exchange state data with the online user's browser, in particular, information about the browser and device used by the website visitor, the website visits history, and the pages viewed. The Hotel collects such information using cookies, pixel tags, and other similar technologies. This information is used by the Hotel to perform web analytics and compile statistics, track visitor flow, and evaluate how visitors interact with the Website, optimise the visitor experience, share data with third-party websites, and redirect users to the Hotel Website.

Since Other Information does not personally identify the visitor, it may be disclosed and used for any purpose not prohibited by law. In some cases (e.g., when a user subscribes to a website using a feedback form), the Hotel may use Other Information in combination with the website visitor's personal data. In this case, such data will be considered personal under this Policy.

6.10.6. The Website Administration may use the user's personal data for the following purposes:

- Identify the user to book a room and/or enter into a services agreement remotely with the Hotel;
- Grant the user access to personalised resources of the Website;

- Establish feedback with the user, including sending notifications, requests regarding the use of the Website and the provision of services, processing requests and applications from the user;
- Identify the user's location to ensure security and prevent fraud;
- Verify the accuracy and completeness of the personal data provided by the user;
- Notify the Website user of the booking status;
- Process and receive payments, verify taxes or tax benefits, dispute a payment;
- Provide the user with effective customer and technical support if issues related to the use of the Website arise;
- Provide the user with special offers, pricing information, newsletters, and other information on behalf of the Website or the Website partners;
- Grant the user access to websites or services of the Website partners in order to receive products, updates, and services.

6.10.7. The Website stores users' personal information in compliance with the applicable laws of the Russian Federation.

6.10.8. The user's personal information is kept confidential, except where the user voluntarily provides information about himself/herself for general access to the general public.

6.10.9. The Website may transfer the user's personal information to third parties in the following cases:

- The user has consented to such actions.
- The transfer is required for the user to use a certain service or to fulfil a certain agreement or contract with the user.
- The transfer is provided for by Russian or other applicable laws as part of the procedure established by law.
- If the Website is sold, all obligations to comply with the terms and conditions of this Policy in relation to personal information received by it are transferred to the purchaser.

6.10.10. The user's personal data are processed for an indefinite period of time using any legal methods, including personal data information systems with or without automation tools. Users' personal data are processed in compliance with Federal Law dated 27 July 2006 No. 152-FZ "On Personal Data."

6.10.11. In the event of loss or disclosure of personal data, the Website Administration will promptly inform the user about the loss or disclosure of personal data.

6.10.12. The Website Administration takes the necessary organisational and technical measures to protect the user's personal information against unauthorised or accidental access, destruction, modification, blocking, copying, dissemination, and any other unlawful actions by third parties.

6.10.13. The Website Administration, together with the user, takes all necessary measures to prevent losses or any other negative consequences caused by the loss or disclosure of the user's personal data.

7. Rights of a Personal Data Subject

7.1. A personal data subject may:

- Obtain information regarding the processing of his/her personal data in the manner, form and time established by the personal data laws;
- Demand clarification, blocking, or destruction of his/her personal data;
- Provide information on personal data in order to use certain services and the Website;

- Update and supplement the provided information on personal data if this information changes.

If personal data are incomplete, outdated, unreliable, illegally obtained, not required for the stated processing purpose, or used for purposes not previously stated when the personal data subject has given his/her consent to the processing of personal data:

- Take measures stipulated by law to protect his/her rights;
- Withdraw his/her consent to the processing of personal data.

7.2. The personal data subject shall provide complete, accurate, and reliable information about his/her personal data.

7.3. The personal data subject's right to access his/her personal data may be restricted in accordance with the federal laws.

8. Rights and Obligations of the Hotel in Personal Data Processing

8.1. The Hotel may:

- Process personal data of the personal data subject in compliance with the stated purpose;
- Require the personal data subject to provide reliable personal data necessary for entering into an agreement, providing a service,
- Identifying the personal data subject, and as otherwise provided for by the personal data laws;
- Restrict the personal data subject's access to his/her personal data if it infringes any third-party rights and legitimate interests, and as otherwise provided for by the laws of the Russian Federation;
- Process publicly available personal data of individuals;
- Process personal data to be published or disclosed on a mandatory basis in accordance with the laws of the Russian Federation;
- Clarify personal data being processed, block or delete if the personal data are incomplete, outdated, inaccurate, illegally obtained, or not required for the stated processing purpose;
- Keep records of requests from personal data subjects;
- Commission personal data processing to a third party with the consent of the personal data subject.

8.2. As required by Federal Law "On Personal Data," the Hotel shall:

- Provide the personal data subject, at his/her request, with information regarding the processing of his/her personal data, or provide a denial on legal grounds;
- At the request of the personal data subject, clarify personal data being processed, block or delete if the personal data are incomplete, outdated, inaccurate, illegally obtained, or not required for the stated processing purpose;
- Keep records of requests from personal data subjects;
- Notify the personal data subject of the personal data process in the event that the personal data have been received not from the personal data subject, except as otherwise provided for by the laws of the Russian Federation;
- If the personal data processing purpose is achieved, immediately stop processing the personal data and destroy the relevant personal data, unless otherwise provided for

by the agreement to which the personal data subject is a party or another agreement between the Hotel and the personal data subject;

- If the personal data subject withdraws the consent to the processing of his/her personal data, stop processing and destroy the personal data within the deadline prescribed by the laws of the Russian Federation. The Hotel shall notify the personal data subject of the destruction of the personal data;
- The Hotel undertakes and obliges other persons who have access to personal data not to disclose the same to third parties and not to disseminate personal data without the consent of the personal data subject, unless otherwise provided for by the federal law;
- Appoint a person (persons) in charge of arranging personal data processing.

9. Measures to Ensure Personal Data Security During Processing

9.1. When processing personal data, the Hotel takes the necessary legal, organisational, and technical measures to protect personal data against unauthorised or accidental access to, destruction, modification, blocking, copying, provision, dissemination of personal data, as well as any other unlawful actions in relation to personal data.

9.2. Personal data security, among other things, shall be ensured by:

- Identifying threats to personal data security during their processing in personal data information systems.
- Taking organizational and technical measures to ensure the security of personal data during their processing in personal data information systems, as required to meet the personal data protection requirements which, if met, ensure the personal data security levels set by the Government of the Russian Federation.
- Assessing the efficiency of measures taken to ensure personal data security before putting the personal data information system into operation.
- Keeping records of computer storage media of personal data.
- Discovering instances of unauthorized access to personal data and taking appropriate measures.
- Restoring personal data modified or destroyed due to unauthorized access.
- Establishing rules for access to personal data being processed in the personal data information system, as well as ensuring that all actions performed with personal data in the personal data information system are recorded.
- Training the Hotel's staff involved in the processing of personal data on the issue of ensuring personal data security.
- Monitoring the measures taken to ensure personal data security and the level of security of personal data information systems.

10. Responsibility of the Hotel

10.1. Compliance with the requirements set forth in this Policy, as well as the rules and requirements applicable to personal data processing at the Hotel is monitored by persons appointed by order of the Hotel's executive body.

10.2. The Hotel, as well as its officials and employees, bear criminal, civil, administrative, and disciplinary liability for failure to comply with the personal data processing principles and conditions, as well as for disclosure or illegal use of personal data in accordance with the laws of the Russian Federation.