

REGULATION ON PROCESSING AND PROTECTION OF PERSONAL DATA

«APPROVED»

Director of the Branch (Head of the Branch) of IHI (Benelux) in SPB



Xuereb Daniel

September 01, 2022

The Regulation on Processing and Protection of Personal Data (hereinafter referred to as the “Regulation”) of the Private Limited Liability Company “International Hotel Investments (Benelux) B.V.”, legal entity, established and existing in accordance with the laws of the Netherlands, acting through the Branch of IHI (Benelux) in SPB, the accreditation entry number (NZA) 10150003920, TIN 9909102905, with its address in Russia at: Nevsky Prospect, 57, let. A, St. Petersburg, is a local regulatory act developed on the basis of the current legislation of the Russian Federation in the field of personal data, in particular the Federal Law of 27.07.2006 № 152-ФЗ “On Personal Data”.

This Regulation establishes a policy regarding the collection, processing purposes of personal data, categories and list of processed personal data, categories of persons whose personal data is processed, methods, terms of processing and storage, detection of violations of the laws of the Russian Federation, the elimination of the consequences of such violations relating to the processing of personal data, procedure for destruction of personal data provided by the person to the operator for the purposes of such processing.

All issues related to the processing of personal data not regulated by this Regulation shall be resolved in accordance with the applicable legislation of the Russian Federation in the field of personal data.

1. General provisions

1.1. This Regulation was developed to comply with the requirements of the legislation of the Russian Federation relating to personal data protection and were prepared in compliance with the Constitution of the Russian Federation, the Civil Code of the Russian Federation, the Federal Law of July 27, 2006 № 152-ФЗ “On Personal Data” (hereinafter – the “Federal Law”) and current legislation of the Russian Federation regarding the protection of personal data.

1.2. Basic concepts used in the Regulation:

- Website – a set of software and hardware for computers that provide a public display of information and data, united by a common target designation, by technical means. The Website in these Regulation means the site located on the Internet at: <https://www.corinthia.com>.

- Operator – an organization that independently or jointly with other persons organizes processing of personal data, as well as specifying the purpose of processing personal data subject to processing, actions (procedures) performed with the personal data. The Operator under this Regulation is the Private Limited Liability Company “International Hotel Investments (Benelux) B.V.”.
- Personal Data Subject – individuals who have given their written consent to the processing of their personal data, the categories of which include:
 - 1) the user of the Internet and, in particular, the Website, who has his personal page (profile/account) or uses the Website to fill out and submit to the Operator the reservation forms (request for reservation) and other forms of documents (hereinafter – the “forms of documents”) posted on the Website for the subsequent conclusion of the contract(s) with the Operator;
 - 2) the client (guest) and the Operator's counteragent, who provided the Operator with their personal data and filled out the relevant forms of documents, contacting the Operator directly by e-mail for the subsequent conclusion of the contract(s) with the Operator;
 - 3) the client (guest) and the Operator's counteragent, who provided their personal data to the Operator during the check-in at the Operator's hotel by filling out the guest registration card form in person;
 - 4) Operator's employees, former employees, candidates for vacant positions, and relatives of employees.
- Personal data – any information referring directly or indirectly to a specified or defined individual (Personal Data Subject).
- Personal data processing – any action (proceeding) or a set of actions (proceedings) performed with the use of automation means, including collection, systematization, accumulation, storage, clarification (update, amendment), disclosure, use, transfer (distribution, submission, access), depersonalization, blocking and destruction of personal data.
- Automatic processing of personal data – processing of personal data using computing tools.
- Personal data distribution – an action aimed at disclosure of personal data to a limited circle of persons by the prior consent of the Personal Data Subject, given in cases and according to the procedure prescribed by the law and this Regulation.
- Personal data submission – actions aimed at disclosure of personal data to a certain person or a certain circle of persons.
- Personal data blocking – temporary suspension of personal data processing (unless processing is necessary to verify the personal data).
- Personal data destruction – actions, the result of which is that it becomes impossible to restore the content of personal data in the informational system of personal data and/or the result of which is the destruction of physical storage devices of personal data.

- Personal data depersonalization – actions, the result of which is that it is impossible to determine the relevance of personal data to a specific Personal Data Subject without the use of additional information.
- Personal data use – actions (proceedings) with personal data performed by the Operator to make decisions or perform other actions that lead to legal consequences regarding the Personal Data Subject or other persons or otherwise affect the rights and freedoms of the Personal Data Subject or other persons.
- Confidentiality of personal data – requirement for the Operator or any other person who obtained access to personal data to prevent its distribution without the consent of the Personal Data Subject or availability of other legal grounds.

1.3. The Regulation establishes the obligations for employees of the Operator involved in the maintenance of the Website regarding the collection of forms of documents and consents for the processing of personal data, in the conclusion of contracts with Personal Data Subjects, the general requirements and rules for working with all kinds of information carriers, which contain personal data of the persons.

1.4. The purposes of the Regulation are as follows:

- to ensure protection of human rights and freedoms while processing personal data, including protection of rights to privacy, personal and family confidentiality;
- to exclude unauthorized actions of employees of the Operator and any third party in collecting, systematizing, storing, refining (updating) personal data, other forms of unlawful interference in informational resources and local computing network of the Operator, to provide legal and regulatory regime of confidentiality of non-documented information, to protect citizens' conscience rights to personal privacy, confidentiality of information that contains personal data, and to prevent possible threats to the safety of the Personal Data Subjects.

2. Purposes and principles of personal data processing

2.1. Purposes of personal data processing:

2.1.1. Processing of personal data in order to make it possible for the Personal Data Subject to interact with the Operator for the subsequent conclusion of the contract(s) between the Personal Data Subject and the Operator for the provision of services, as well as the subsequent fulfillment of the contract(s), including using the services of third-party companies.

2.1.2. Processing of personal data for the purposes of concluding and regulating labor relations and other directly related relations, reflection of information in personnel documents, calculation of wages, calculation and payment of taxes, fees and contributions for mandatory social and pension insurance stipulated by the legislation of the Russian Federation, submission of statutory reporting on individuals by the Operator, including personalized accounting information to the Pension Fund of the Russian Federation, income tax information to the Federal Tax Service of Russia, information to the Social Insurance Fund of the Russian Federation, providing information to the credit organization for registration of a bank card and transfer of wages to it, provision of information to third parties for registration of VHI policy, provision of tax deductions.

2.2. No personal data shall be used for the purpose of causing property or moral harm to citizens or impeding the realization of the rights and freedoms of citizens of the Russian Federation and foreign nationals.

2.3. Principles of personal data processing:

- processing of personal data shall be carried out on a legal and fair basis;
- processing of personal data shall be limited by specific, predetermined, and legitimate purposes. No processing of personal data that is incompatible with the purpose of collecting personal data is permitted;
- only personal data that corresponds to the purposes of its processing are subject to processing;
- content and volume of the processed personal data shall correspond to the stated processing purposes. The processed personal data shall not be excessive in relation to the stated processing purposes;
- when processing personal data, the accuracy of personal data, its sufficiency, and, if necessary, its actuality in relation to the purpose of personal data processing shall be ensured;
- storage of personal data should not be carried out any longer than the processing of personal data requires, unless the term for storing personal data is specified in the Federal Law, or the contract to which the Personal Data Subject is a party;
- personal data to be processed are subject to deletion or depersonalization upon completion of the processing purposes or in case of failure to meet these purposes, unless otherwise stipulated by the Federal Law.

2.4. The personal data of the Personal Data Subjects shall be processed using the automatic means.

3. Rights of the Personal Data Subjects

3.1. The Personal Data Subject has the right to receive information about the personal data Operator, his location, the personal data available to the personal data Operator, related to a specific Personal Data Subject, as well as on familiarization with such personal data, except for cases specified in clause 8 of Article 14 of the Federal Law.

3.2. The Personal Data Subject has the right to receive from the Operator (in person or through a written request from the Personal Data Subject or his representative) the following information concerning the processing of his personal data, including:

- the confirmation of the fact of processing personal data by the Operator;
- the legal basis and purpose of personal data processing;
- methods of processing personal data used by the Operator;
- the name and location of the Operator, information about the persons (except for the Operator's employees), who have access to personal data or who may be provided with personal data on the basis of a contract with the Operator or on the basis of the Federal Law;
- the processed personal data relating to the relevant Personal Data Subject, source of their receipt, if other procedure for transmitting such data is not stipulated by the Federal Law;

- terms of processing personal data, including the terms of their storage;
- the procedure for the Personal Data Subject to exercise his/her personal rights as prescribed by the Federal Law;
- the information about the implemented or proposed transboundary data transfer;
- the company's name or surname, name, patronymic and address of the person processing personal data by order of the Operator, if the processing is or will be carried out by such a person;
- the other information prescribed by the Federal Law or other federal laws.

The Personal Data Subjects have the right:

- to request changes, clarifications, destruction of information about themselves;
- to complain about inappropriate actions or failure to act on processing personal data and demand appropriate compensation in court;
- to complete the personal data of the estimated character with the application that expresses its own point of view;
- to select defense counsels for protection of their personal data;
- to request a notification from the Operator about all changes or exceptions made in them.

4. Obligations of the Operator

4.1. Upon receipt of a personal request or a written request from the Personal Data Subject or his/her representative, the Operator is obliged within 10 working days from the date of receipt of such a request (the period may be extended by five working days in the case of a motivated notice sent by the Operator to the Personal Data Subject specifying the reasons for extending the period for providing the requested information) to provide information to the extent established by the Federal Law.

4.2. In case of refusal to provide the Personal Data Subject or his/her representative with information about the existence of personal data on the relevant Personal Data Subject, the Operator is obliged to give a written motivated response containing a reference to the provision of clause 8 of article 14 of the Federal Law or another federal law which is the basis for such a refusal, within 10 working days from the date of receipt of request by the Personal Data Subject or his/her representative.

4.3. In case of receipt of a request from the authorized agency for the protection of the Personal Data Subjects' rights about the provision of information required to carry out the activities of the specified agency, the Operator is obliged to provide such information to the authorized agency within 10 working days from the date of receipt of such request (the term may be extended by five working days if the Operator sends a motivated notice to the authorized agency stating the reasons for extending the deadline for providing the requested information).

4.4. In case of detection of unlawful processing of personal data during communication or at the request of the Personal Data Subject or her/his representative or authorized agency, the Operator is obliged to block the processing of personal data, relating to this Personal Data Subject from the date of receipt of the specified request for the inspection period.

4.5. In case of detection of unlawful processing of personal data carried out by the Operator, the latter shall stop unlawful processing of personal data within three working days from the date of such detection. If it is impossible to ensure the lawfulness of personal data processing, the Operator shall destruct such personal data within a period not exceeding ten business days from the date of detection of unlawful processing of personal data. The Operator shall notify the Personal Data Subject or her/his representative about the elimination of violations or the destruction of personal data, and if the appeal of the Personal Data Subject or her/his representative was sent by the authorized agency for the protection of the rights of Personal Data Subjects, also notify that agency.

4.6. If the purpose of personal data processing is achieved, the Operator must stop processing personal data and delete personal data within a period not exceeding 30 days from the date the purpose of personal data processing is achieved, unless otherwise provided by the contract, to which the Personal Data Subject is a party.

5. Personal data confidentiality restrictions

5.1. The information about personal data is confidential.

5.2. The Operator shall ensure the confidentiality and safety of personal data during its processing in accordance with the requirements of the legislation of the Russian Federation.

5.3. The Operator shall not disclose any personal data to third parties or distribute them without the consent of the Personal Data Subject, unless otherwise stipulated by the Federal Law.

5.4. Persons processing personal data are obliged to comply with the requirements of the regulatory documents of the Operator in terms of confidentiality and security of personal data.

6. Processing of personal data

6.1. The personal data of subjects under categories 1 to 3 include:

- surname, name, patronymic (full name);
- gender;
- nationality;
- citizenship;
- date of birth;
- country and place of birth;
- registration address of residence and address of actual residence / stay;
- period of registration at the place of residence;
- telephone number (home, mobile);
- details of the main identity document;
- details of the document confirming the right to stay / residence on the territory of the Russian Federation;
- address of the previous place of stay on the territory of the Russian Federation and the purpose of entry;
- e-mail.

The confidentiality restrictions also apply to:

- dates of arrival / departure of the Personal Data Subject, the period of stay;
- actual stay of the Personal Data Subject at the Operator's hotel;
- forms of payment and amounts of invoices for accommodation, additional services.

6.2. The personal data of subjects under category 4 include:

- surname, name, patronymic (full name);
- gender, age;
- date and place of birth;
- passport data;
- registration address of residence and address of actual residence;
- telephone number (home, mobile);
- data of documents on education, qualifications, professional training, information on advanced training;
- marital status, information on the composition of the family, which the employer may need to provide benefits under labor and tax law;
- relation to military service;
- information about employment history, previous jobs, income from previous jobs;
- SNILS (personal insurance policy number);
- TIN;
- information on hiring, transfer, dismissal and other events related to labor activity at the previous place of employment;
- information on business and other personal qualities of an evaluative nature.

6.3. The right to access the personal data of the Personal Data Subjects shall be vested in the persons who are authorized by the relevant authorities in accordance with their official duties and who have been familiarized with this Regulation against their signature.

6.4. The procedure and period of personal data processing.

6.4.1. The Operator's right to process personal data arises from the moment of providing consent to the Operator for processing of personal data by the Personal Data Subject. The period of storage of personal data, both on paper and electronic media, shall not exceed 3 (three) years from the date of consent to the processing of personal data, unless another period is provided for by the legislation of the Russian Federation.

6.4.2. If the Personal Data Subject or his representative withdraws his consent to the processing of personal data, the Operator shall cease processing of personal data or ensure the cessation of such processing, and if the preservation of personal data is no longer required for the purposes of processing of personal data, destroy personal data or ensure their destruction within 30 (thirty) days from the date of obtaining the revocation of the consent of the Personal Data Subject for processing his personal data, unless otherwise provided by the contract.

6.4.3. If the Personal Data Subject or his representative applied to the Operator with the requirement to terminate processing of personal data, the Operator is obliged within no more than 10 (ten) working days from the date of receipt of the corresponding request, to cease its processing or provide termination of such processing, as provided in paragraphs 2 - 11 of Part 1 of Article 6, Part 2 of Article 10 and Part 2 of Article 11 of the Federal Law.

7. Personal data destruction

7.1. The destruction of personal data shall be carried out when the purpose of personal data processing is achieved – within 30 days from the date of achievement of the purpose of personal data processing, unless otherwise provided by the legislation of the Russian Federation, or the contract to which the Personal Data Subject is a party.

7.2. The Personal Data Subject or his representative has the right to demand the destruction of his personal data in writing when the personal data is incomplete, incorrect, inaccurate, illegally obtained or not necessary for the stated purpose of processing.

7.3. In case there is no possibility to destruct the personal data, the Operator shall block such personal data.

7.4. The destruction of personal data shall be made by deleting the information using a certified program with guaranteed destruction of the data (according to the specified characteristics of the installed program with guaranteed destruction).

7.5. In some cases, the Operator may need to process or disclose the personal data of the Personal Data Subject due to the purposes listed in this Regulation or other legally stipulated purposes. The Operator may disclose the subject's personal data to:

7.5.1. agents, consultants and subcontractors – partners of the Operator, including reservation and booking systems that comply with applicable security requirements and confidentiality obligations;

7.5.2. in cases where the legislation of the Russian Federation provides for such an obligation of the Operator.

8. Personal data protection system and liability

8.1. Measures to ensure the safety of personal data during its processing.

8.1.1. When processing personal data, the Operator is obliged to take the necessary legal measures, organizational and technical measures or ensure their acceptance to protect personal data from unlawful or accidental access to them, destruction, modification, blocking, copying, transmitting, spreading of personal data as well as other unlawful actions in relation to personal data.

8.1.2. The security of personal data is ensured, in particular, by:

- the specification of security threat types and levels of personal data protection when they are processed in informational personal data systems;
- the use of organizational and technical measures to ensure the safety of personal data during its processing in the personal data informational systems, necessary to meet the requirements for the protection of personal data;
- the use of procedures that passed the established procedure for assessing the conformity of the means of information protection;
- the assessment of the effectiveness of applied measures to ensure the safety of personal data prior to the commissioning of the informational personal data system;
- the data medium of the personal data;

- the detection of facts of unauthorized access to personal data and adoption of measures;
- the retrieval of personal data that were modified or destroyed due to unauthorized access;
- the establishment of access rules to personal data processed in the personal data informational system, as well as ensuring that all actions performed with the personal data in the personal data informational system are registered and recorded;
- the control over applied measures to ensure the safety of personal data and the level of protection of personal data informational systems.

8.1.3. For the purposes of the Regulation under the threats to the security of personal data mean the totality of conditions and factors that create a danger of unauthorized access to personal data, including accidental access to personal data, the result of which may be destruction, change, blocking, copying, transmitting, distribution of personal data, as well as other unlawful actions during their processing in the personal data informational system. The level of protection of personal data means a comprehensive indicator that characterizes the requirements, requirements, the fulfillment of which ensures neutralization of certain threats to the safety of personal data during their processing in the informational system of personal data.

8.2. Requirements for the personal data protection system – the system of personal data protection shall comply with the “Requirements for protection of personal data during its processing in the informational personal data systems”, approved by the Resolution of the Government of the Russian Federation № 1119 of 01.11.2012.

8.2.1. The system of protection of personal data shall provide:

- the immediate disclosure and prevention of unauthorized access to personal data and (or) its transfer to persons who do not have the right to access such information;
- the prevention of interference with the technical means of automatic processing of personal data, which may result in their malfunction;
- the possibility of immediate retrieval of personal data that were modified or destroyed due to unauthorized access to them;
- the permanent control over the level of protection of personal data.

8.2.2. The means of protection of information used in informational systems shall pass the conformity assessment procedure in the prescribed order.

8.3. Methods and means of protection of information in informational systems of personal data:

8.3.1. Methods and means of protection of information in informational systems of personal data of the Operator shall comply with the requirements of the Order of FSTEC (Federal Service for Technical and Export Control) of the Russian Federation № 21 of February 18, 2013.

8.3.2. The main methods and means of protecting information in the personal data systems of Personal Data Subjects are methods and means of protecting information from unauthorized use, including accidental access to personal data, the result of which could be destruction, change, blocking, copying, distribution of personal data, or other unauthorized actions.

8.4. Measures for the protection of information that contains personal data:

8.4.1. Measures for the protection of data bases containing personal data taken by the Operator shall include:

- the selection of the information list that contains the personal data;
- the exclusion of access to information containing personal data by establishing the procedure for handling this information and controlling the compliance with such procedure.

8.4.2. Measures to protect the confidentiality of information are deemed reasonably accurate if:

- it is prohibited to access the personal data of any third parties without the consent of the Operator;
- it is ensured that information containing personal data may be used without violating the laws on personal data;
- while working with the Personal Data Subject, there is a specified procedure for the Operator's actions, which ensures the preservation of information containing the personal data of the Personal Data Subject.

8.4.3. Personal data cannot be used for purposes contrary to the requirements of the Federal Law, protection of the foundations of the constitutional order, morality, health, rights and legitimate interests of other persons, protection of the country's defense and security of the state.

8.5. The responsibility.

8.5.1. All employees of the Operator, who process personal data, are obliged to keep confidentiality of the data containing personal data, in accordance with the Regulation and the requirements of the legislation of the Russian Federation.

8.5.2. Every Operator's employee who receives for work a document containing the personal data of the Personal Data Subject shall be solely responsible for the safety of the storage medium and the confidentiality of the information.

9. Elimination of violations of legislation in the field of personal data

9.1. In case of detection of the fact of unlawful or accidental transfer (provision, distribution, access) of personal data, resulting in a violation of the rights of Personal Data Subjects, the Operator shall notify the authorized body on the protection of the rights of Personal Data Subjects from the moment of detection of such an incident:

9.1.1. within 24 hours about the incident that occurred, the alleged causes that led to the violation of the rights of Personal Data Subjects, and the alleged harm caused to the rights of Personal Data Subjects, the measures taken to eliminate the consequences of the incident, as well as provide information on the person authorized by the Operator to interact with the authorized body on the protection of the rights of Personal Data Subjects, on issues related to the incident identified;

9.1.2. within 72 hours of the results of the internal investigation of the incident and provide information about the persons whose actions caused the incident (if any).

10. Final Provisions

10.1. In case of changes in the current legislation of the Russian Federation, changes in the regulatory documents on the protection of personal data, this Regulation applies to an extent that does not

contradict the current legislation of the Russian Federation before bringing it into conformity with those.

10.2. The terms and conditions of this Regulation are established, amended and cancelled by the Operator in a unilateral manner without prior notification of the Personal Data Subject. In the event of a substantial change in the terms of this Regulation, the Operator notifies the Personal Data Subject by posting a new version of the Regulation on the Website.

10.3. If the Personal Data Subject does not agree with the terms of this Regulation, he must immediately delete his profile from the Website, or revoke it in accordance with the procedure set forth in clauses 6.4.2 hereof, his consent to the processing of personal data, otherwise, the inaction of the Personal Data Subject means that he has agreed with the terms of this Regulation.