

REGULATION ON PROCESSING AND PROTECTION OF PERSONAL DATA OF  
"CORINTHIA HOTEL ST PETERSBURG" CLIENTS

«APPROVED»

Director of the Branch (Head of the Branch) of IHI (Benelux)  
in Saint-Petersburg

Patrick Catania



March 28, 2018

The present Regulation on processing and protection of personal data of “Corinthia Hotel St. Petersburg” clients (hereinafter – the “Hotel”) is a local legislative act developed on the basis of the current legislation of the Russian Federation in the field of personal data, in particular the Federal law dated 27.07.2006 N 152-FZ "On personal data".

The present Regulation defines the policy, order and conditions of the Hotel for processing of personal data and establishes the procedures directed to prevention and identification of violations of the law of the Russian Federation, elimination of consequences of such violations related to personal data processing.

All issues related with personal data processing which are not regulated by the present Regulation shall be resolved according to the current legislation of the Russian Federation in the field of personal data.

Processing of personal data is carried out with respect for the principles and rules provided by the Federal law dated 27.07.2006 N 152-FZ "On personal data" and by the present Regulation.

Methods of personal data processing:

- with use of the automated facilities;

Personal data which can identify the owner of personal data is carried out in information systems of the Hotel.

1. General terms and conditions

1.1. The present Regulation is developed for ensuring protection of Hotel clients' personal data.

1.2. The basic definitions used in the Regulation:

- Hotel - an organization, that provides hotel services to the Client;
- Client – private individual, a consumer of hotel services, a subject of personal data;

- Hotel services - Hotel actions for accommodation of Clients at the accommodation facility, as well as other activities related to accommodation, which includes basic and additional services, provided to the Client;
- Personal data - information, stored in any format relating to a certain individual (subject of personal data), which combination with other information available to the Hotel, allows the identification of the Client's identity;
- Processing of personal data - actions (operations) with personal data, including collection, systematization, accumulation, storage, updating (modification), usage, distribution (including cross-border transfer), depersonalization, blocking and destruction of personal data. Herewithin the processing of personal data is carried out by Private Limited Liability Company "International Hotel Investments (Benelux) B.V.", address: Hoogoorddreef 15, 1101 BA Amsterdam, Netherlands, acting through the Branch of IHI (Benelux) in SPB, address: Nevsky Prospect 57, lit. A, Saint Petersburg, Russia; Limited Liability Company "International Hotel Investments Saint Petersburg", address: Nevsky Prospect 57, lit. A, Saint Petersburg, Russia; CHI Limited, address: 1 Europe Centre, Floriana FRN 1400, Malta; GHA Services SA, 28 Boulevard du Pont D'Arve, CH-1205 Geneva, Switzerland, www.gha.com; UHC Holdings Cayman LTD, address: 190 Elgin Avenue, George Town, Grand Cayman KY1-9005, Cayman Islands;
- Use of personal data - actions (operations) with personal data, made by the operator for the purpose of making decisions or performing other actions that generate legal consequences in respect of the subject of personal data or other people;
- Confidentiality of personal data - a requirement for the operator or other person who has an access to a personal data not to allow their distribution without consent of the subject of personal data or the presence of other legal grounds.

1.3. The present Regulation establishes the procedure of processing personal data of the Customers for which the Hotel provides the full range of services for accommodation at the Hotel.

1.4. The purpose of the Regulation is ensuring protection of human and civil rights and freedoms when processing his personal data.

1.5. Personal data of clients is processed for execution of the contract on rendering of services for accommodation or temporary accommodation, one of the parties of which is the Client. The Hotel collects data only in the volume necessary for achievement of the specified purpose.

1.6. Personal data cannot be used to cause property and moral harm to citizens, difficulty of exercising the rights and freedoms of the Russian Federation citizens and foreigners.

1.7. The present Regulation is approved of by the Director of the Branch (Head of the Branch) and is obligatory for execution by all employees having access to Client's personal data.

2. Content and receiving of Clients' personal data.

2.1. Information on personal data of Clients is confidential. The personal data includes:

- biographical details (full name, date of birth, place of birth, etc.)
- passport data (including registered address, residence address);
- contact telephone number;
- e-mail address.

Confidentiality shall also be applied to:

- dates of arrival / departure of the Client, accommodation period;
- actual time of stay of the Client in the hotel;
- payment methods and amounts of the issued invoices for accommodation, additional services;
- guest's visitors, their number, contact information, time spent in the Client's room.

2.2. In case it is necessary to apply non-disclosure mode to other categories of information, the Director of the Branch (Head of Branch) has the right to issue the order on giving the confidentiality status to the information, with obligatory acquaintance of with the order by the employees, who have access to the specified information and subsequent entering of the specified information into the list established by the present Regulation.

### 3. Processing and storage of Clients' personal data.

3.1. Processing of personal data by the Hotel for the benefit of Clients consists of receiving, systematization, accumulation, storage, specification (updating, change), use, distribution, depersonalization, blocking, destruction and protection against unauthorized access to Clients' personal data.

3.2. The consent of Clients to personal data processing is provided after signing the guest registration card (processing of personal data is carried out for execution of the contract, where one of the parties is the subject of personal data – the Client).

3.3. Processing of Clients personal data is conducted by means of dissimilar processing: processing of hard and digital copies. At check in the Client is providing his personal data by filling the required documents. After Hotels' services are rendered and all necessary financial operations are made by the cashier the documents which contain personal data should be passed to Financial department.

3.4. Access to processing of Client personal data is only provided to employees of the hotels, who are admitted to work with Client personal data and who signed the present Regulations and to employees of the organisations processing Clients personal data for the purpose of providing the attendant services for hotel services on the basis of the contracts concluded with the Hotel. Processing of Clients personal data is conducted only on the basis of the written consent of the Client.

3.5. The documents containing personal data of Clients to whom the services were rendered are stored in the archive of the Financial department, access for unauthorized persons is forbidden.

3.6. Client personal data in electronic format is stored in hotel local computer network. The server if Hotel's local computer network is located at the address: Nevsky prospect, b. 57, lit. A, St. Petersburg. Only the persons allowed to processing of personal data of Clients have access to personal data.

### 4. Use and transfer of personal data of Clients. Regime of information confidentiality

4.1 The use of personal data of clients by the Hotel is carried out to achieve the goals, defined by the agreement between the Client and Hotel, in particular, for the provision of services for accommodation or temporary accommodation, and additional services.

4.2 When transferring the personal data of the Clients, the following requirements must be observed by the Hotel:

4.2.1 Warn people who receive Clients' personal data that these data can only be used for the purposes for which they are reported and require these individuals to confirm that this rule is observed. People,

receiving personal data of customers are required to comply with the confidentiality regime. This provision does not apply in the case of depersonalization of personal data and with respect to publicly available data.

4.2.2 Permit access to personal data of clients only to specially authorized people, and these people should have the right to receive only those personal data that are necessary for performing specific functions.

4.3. The hotel carries out trans-border transfer of personal data.

4.4. The persons who in accordance with the established procedure got access to personal data and other confidential information are obliged not to provide and not to disclose such information in any possible form (verbal written, other form, including use of technical means) without the consent of the owner of such an information.

5. Protection of the Clients' personal data from the unauthorized access.

5.1. While processing the clients' personal data, the Hotel has to take appropriate organizational and technical measures to protect personal data from unauthorized or accidental access, destruction, alteration, blocking, copying, distribution of personal data, as well as other unlawful actions.

5.2. For effective Clients' personal data protection, it is required:

5.2.1. to comply with the procedure of receiving, accounting and storage of Clients' personal data;

5.2.2. to acknowledge all the employees related to receiving, processing and protection of personal data of the Customer with the present Regulations and to provide necessary orientation;

5.2.3. to bring employees, responsible for violations of the rules regulating receiving, processing and protection of personal data of the Client, to disciplinary responsibility.

5.3. It is prohibited to give access to Clients' personal data to Hotel employees, who do not have the right for this access.

5.4. Protection of access to electronic databases, containing Clients' personal data, is provided by:

- usage of licensed software preventing unauthorized access of third parties to Clients' personal data;

- password system. Passwords are set by the system administrator and reported individually to employees who have access to personal Clients' data.

5.5. Copying and making extracts from Clients' personal data is permitted only for official purposes with the written permission of the authorized representative.

5.6. The staff of Hotel is not allowed to take copies and circulate documents containing Client's personal data, except for cases, when it is required by the production need for execution of the functions by the employees.

5.7. When working with the Clients' personal data, the staff of Hotel should observe the measures preventing and limiting access to the specified information of the persons who are not authorized for its receiving. Including:

- not to transfer the password for access to hotel control system to the third parties;
- upon finishing the work in the system – to log out;
- not to allow storage of the registration questionnaires and other documents containing confidential information in open access;
- to keep the procedure of personal data processing according to the present Regulation;
- archives of documents are stored in the room with limited access in the lockers during the term established by normative legal acts of the Russian Federation;
- after the expiration of the period of storage established by normative legal acts of the Russian Federation documents are destroyed by a specialized company authorized for destruction of such documents.

5.8. Violation of these duties is considered committed when persons who should not have such information learned the information containing personal data and other confidential information.

5.9. According to the permission of state regulator and persons of the organization, disclosure of confidential information (personal data) to the third parties is possible in case of the activity, which demands knowledge of such the information and only in that volume which is necessary for realization of the purposes and tasks of the organization and, also in case they accept obligations not to disclose the received data.

6. Obligations of the Hotel staff for ensuring safety of personal data.

6.1. The hotel is obliged:

6.1.1. To process Clients' personal data only for the purpose of providing lawful hotel services to Clients.

6.1.2. Not to receive and not process Client's personal data on his race, national origin, political opinions, religious or philosophical beliefs, health, sexual life, except for the cases provided by law.

6.1.3. To provide access for their personal data to the Client or his legal representative when you receive a request containing the number of the basic document proving the Client's or his lawful representative's identity; information on date of issuance of the document; the issuing authority and the Client's or his legal representative's handwritten signature. The request may be sent electronically according to the law of Russian Federation. Information on availability of personal data should be provided to the Client in an accessible form and should not contain personal data relating to other subjects of personal data.

6.1.4. To ensure the storage and protection of Clients' personal data from unauthorized use or loss. Period of retaining personal data cannot exceed 4 years.

6.1.5. In case of identification inaccurate personal data or wrongful Hotel's actions with them, subject's request for his personal data or his legal representative or authorized body on protection of the rights of subjects personal data the Hotel is obliged to carry out blocking of personal data relating to that data subject, since such treatment or getting of such request for a checking period.

6.1.6. In the case of confirmation of the fact of unauthenticity of personal data the Hotel on the basis of documents submitted by the personal data subject or his legal representative or authorized body on protection of the rights of subjects of personal data or other necessary documents is obliged to specify the personal data and to remove their blocking.

6.1.7. In case of revealing of wrongful actions with personal data the Hotel in time, not exceeding three working days from the date of such revealing, is obliged to eliminate the violations. In case of impossibility of elimination the violations, the Hotel in a period not exceeding three working days from the date of revealing the illegitimacy of actions with personal data, is obliged to destroy personal data. On elimination of the violations or destruction the personal data the Hotel is obliged to notify the personal data subject or his legal representative, and in case the appeal or request was sent by the authorized body on protection of the rights of subjects of personal data, also the specified body.

## 7. Rights of the Client

7.1. The client has the right to:

- access to information about oneself, including information that confirms the fact of processing personal data, and the purpose of such processing; methods of processing personal data used by the Hotel; information on people who have access or are able to get access to personal data; the list of processed personal data and the source of their receipt, the processing of personal data, including the time of their storage; information on what legal consequences for the Client may entail the processing of his personal data;
- definition of forms and ways of processing personal data;
- limiting of the ways and forms of processing personal data;
- prohibition of the dissemination of personal data without his agreement;
- change, refinement, destruction of information about oneself.

## 8. Liability for violation of the rules governing the processing of personal data of clients

8.1. The Hotel is responsible for the personal information that is at their disposal and fixes the personal responsibility of the employees for observing the established confidentiality regime.

8.2. Every employee who receives a document containing Client's personal data is solely responsible for the safety of the media and the confidentiality of information.

8.3. Any person can apply to the employee of the Hotel with a complaint about violation of this Regulation. Complaints and statements regarding compliance with data processing requirements are considered within three days from the date of receipt.

8.4. Employees of the Hotel are obliged to ensure, at the proper level, the consideration of requests, applications and complaints from the Clients, and also to promote the fulfillment of the requirements of the competent authorities.

8.5. People guilty of violating the rules governing the receipt, processing and protection of the personal data of the Clients shall bear disciplinary, administrative, civil or criminal liability in accordance with the legislation of the Russian Federation.

## 9. Final provisions

9.1. The present Regulation shall come into force from the moment of its approval by the Director of the Branch (Head of the Branch) of IHI (Benelux) in SPB.

9.2. Amendments and additions to the present Regulation can be made on the basis of the order issued by the Director of the Branch (Head of Branch) of IHI (Benelux) in SPB.