

Privacy Policy of Europe Hotel LLC

PLEASE CAREFULLY READ THIS POLICY. BY USING THE WEBSITE WWW.GRANDEUROPECATERING.COM AND/OR THE WEBSITE WWW.GRANDHOTELEUROPE.COM, YOU, THE USER, HEREBY AGREE TO THIS POLICY AND THE CONDITIONS OF YOUR PERSONAL DATA PROCESSING DESCRIBED IN THIS POLICY. IF YOU DO NOT AGREE, DO NOT USE THE WEBSITES.

1. General

- 1.1. This Privacy Policy is adopted in accordance with art.18.1(1)(2) of the Federal Law of the Russian Federation On Personal Data No.152-ФЗ dated 27 July 2006. This Privacy Policy declares the views of Europe Hotel LLC regarding the personal data processing and protection and the observance of data subjects' rights and freedoms, in particular, the right to a private life and personal and family secrets, in the course of operating the websites www.grandeuropcatering.com и www.grandhoteleurope.com, as well as in cases where data subjects come in contact re catering, hotel booking, or other services according to the email addresses and telephone numbers specified on the websites.
- 1.2. Europe Hotel LLC, a legal entity established under the laws of the Russian Federation (main state registration number (OGRN) 1047855113393 and tax identification number (INN) 7841304521) and registered at 1/7 Mikhailovskaya street, St Petersburg, 191011, the Russian Federation, shall be the personal data operator.
- 1.3. The policy of Europe Hotel LLC in respect of the personal data processing is that the personal data shall be processed on a lawful and equitable basis in cases and according to procedures established by the applicable laws. The observance and protection of rights and legal interests of data subjects shall be the first priority of Europe Hotel LLC.
- 1.4. For the purpose of this Policy, the following terms, whether capitalized or regular, shall have the meanings specified below.
 - Analytical Data* shall have the meaning set forth in clause 7.2 hereof.
 - Act* shall mean the Federal Law of the Russian Federation On Personal Data No.152-ФЗ dated 27 July 2006.
 - Analytics Tools* shall mean instruments of web analytics, online ratings, and other similar instruments used for the assessment of Website views and visitor appreciation of the Websites and parts thereof, analysis of the demand for the services offered on the Websites, and achievement of other similar goals.
 - Blockage* shall mean a temporary suspension of the personal data processing (except where the processing is required to clarify personal data).
 - Booking Systems* shall mean the Online Booking Module TravelLine: Booking Engine available at <https://grandhoteleurope.com/booking/>.
 - Collection* shall mean a dedicated process of obtaining the personal data directly from the data subjects.
 - Company* shall mean Europe Hotel LLC acting as the operator of the Data.
 - Confidentiality of Personal Data* shall mean the prohibition on disclosing the personal data to third parties without the data owner's permission by a person having access to this personal data.
 - Contact Persons (Marketing)* shall have the meaning set forth in clause 4.3 hereof.
 - Cross-border Data Transfer* shall mean the transfer of personal data to a foreign operator into the territory of a foreign state.
 - Customers* shall have the meaning set forth in clause 4.3 hereof.
 - Data Processing* shall mean an action (operation) or set of actions (operations) with the personal data performed either with automation tools or without them, including the collection, record,

systematization, accumulation, storage, clarification (update and change), extraction, use, transfer (provision and access), blockage, deletion, and destruction of the personal data.

Data shall mean personal data processed by the Company according to this Policy.

Data Subject shall mean a natural person to whom the personal data belongs.

Destruction shall mean any actions resulting in the impossibility to restore the contents of the personal data in the IT System and/or in the destruction of media containing the personal data.

Guests shall have the meaning set forth in clause 4.3 hereof.

Hotel shall mean Grand Europe Hotel located at 1/7 Mikhailovskaya street, St Petersburg, 191011, the Russian Federation.

IT System shall mean a complex of databased personal data together with the processing information technologies and technical instruments.

Operator shall mean a state or municipal body, legal entity, or natural person who/that independently or together with others organizes and/or conducts the personal data processing as well as determines the processing purposes, content of the processed personal data, and actions (operations) with the personal data.

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

Policy shall mean this Privacy Policy.

Provision of Personal Data shall mean any actions aimed at the disclosure of personal data to a particular person or a particular group of persons.

Roscomnadzor shall mean the personal data protection authority.

Storage shall mean the process of keeping systematized personal data in the Company's possession.

Update shall mean actions of clarifying, updating, and amending the personal data aiming at keeping the personal data up-to-date according to the data processing purposes.

Users shall mean all data subjects whose Data shall be collected and processed with the Websites. The Guests, Customers, Contact Persons (Marketing), and other visitors shall be regarded as the Users.

Website shall mean any of the Websites or one of the Websites depending on context.

Websites shall mean the Company's websites available at www.grandeuropецatering.com and www.grandhoteleurope.com.

1.5. The data subjects shall have the right to

- receive information regarding the processing of his/her Data;
- demand for clarifying, blocking or destroying his/her Data if the Data is incomplete, outdated, incorrect, unlawfully received or unnecessary for the declared processing purpose;
- appeal against the Company's actions (omissions) to the competent authorities, including courts;
- protect his/her rights and legitimate interests including the compensation of damages and/or moral hazard in a judicial or other appropriate legal procedure established by the applicable laws;
- demand for ceasing the personal data processing in cases prescribed by the applicable laws; and
- exercise other rights established by the applicable laws.

1.6. As the Data operator, the Company shall have the right to process the Data only in cases, for the purposes and according to other conditions established by the Act.

1.7. The Company shall perform the following main obligations:

- provide the data subject, upon his/her request, the with the information specified in art.14(7) of the Act when collecting the Data;
- explain to the data subject the legal consequences of the data subject's refusal to provide the Data;
- take necessary and sufficient measures for performing the obligations established by the Act and regulatory acts adopted according to the Act;
- publish this Policy and the information about the fulfilled prsonal data security requirements on the Website pages, on which the personal data is collected, and ensure that the said document is accessible;

- take necessary legal, organisational, and technical measures or ensure that they are taken for the protection of the Data from unlawful or accidental access, destruction, change, blockage, copy, provision, distribution and other unlawful actions;
- notify Roscomnadzor according to the procedure established by the Act and the Company's internal policies if a fact of unlawful or accidental transfer (provision, distribution, access) of personal data infringing data subject's rights is revealed;
- Reply to the messages from data subjects and requests from Roscomnadzor and provide them with the information concerning the Data processing according to the procedure established by the Act;
- eliminate violations of laws committed during the Data processing, clarify, block and destroy the Data (or ensure that this is done by a data processor);
- notify Roscomnadzor of the Company's intention to process the personal data before beginning the processing except for the cases established by the applicable laws;
- appoint the data protection officer; and
- perform other obligations connected with the Data processing, as prescribed by the applicable laws.

2. Data Collection Purposes

- 2.1. The Data processing shall be limited with the achieving of concrete, pre-defined, and lawful purposes. It is prohibited to process the Data if it does not meet the purposes of personal data collection.
- 2.2. The Company shall process the Data for the purposes specified in clause 4.3 hereof.

3. Legal Basis for Data Processing

- 3.1. The legal basis for the personal data processing is a set of legal acts, according to which and in compliance with which the operator processes the personal data.
- 3.2. The legal bases for the processing of the Data are specified in p.4.3 hereof.

4. Data Categories. Data Subjects

- 4.1. The content and volume of the processed Data shall be in line with the pre-defined processing purposes. The processed Data shall not be excessive as regards the pre-defined processing purposes.
- 4.2. In no case shall the Company process special categories of the personal data (e.g., race, ethnical origin, political views, and religious or philosophical beliefs) and biometrical personal data.
- 4.3. Information about the main categories and volume of the processed Data with regard to the processing purposes is specified below.

Data Subjects	Data Categories	Data Processing Purposes	Data Processing Methods	Data Processing and Retention Time Frames	Destruction Procedure	Lawful Basis for Data Processing
<p>Customers</p> <p>The <i>Customers</i> shall mean natural persons who either consider ordering the Company's services, or have already established legal relations about such services with the Company (except for the guests).</p>	<ul style="list-style-type: none"> – surname, first name, and patronymic; – contact details (phone number, email address); – order content; – web analytics. 	Offering of catering and other related services	With automation tools and without automation tools	Until the customer makes a decision regarding the ordering of catering and other related services	Destruction of paper documents (shredding). Deleting the data from the IT Systems	Data subject's consent: art.6(1)(1) of the Federal Law of the Russian Federation On Personal Data No.152-Φ3 dated 27 July 2006.
	<ul style="list-style-type: none"> – surname, first name, and patronymic; – contact details (phone number, email address); – payment details; – gift certificate number. 	Purchasing and using gift certificates	With automation tools and without automation tools	Gift certificate validity term (1 year) and, thereafter, the limitation term (3 years)	Destruction of paper documents (shredding). Deleting the data from the IT Systems	Data subject's consent: art.6(1)(1) of the Federal Law of the Russian Federation On Personal Data No.152-Φ3 dated 27 July 2006. Conclusion of the gift certificate purchase agreement on the initiative of the data subject or the agreement according to which the data subject is a beneficiary: art.6(1)(5) of the Federal Law of the Russian Federation On Personal Data No.152-Φ3 dated 27 July 2006.

<p>Contact Persons (Marketing)</p> <p>The <i>Contact Persons (Marketing)</i> shall mean representatives and other employees of legal entities or individual entrepreneurs, in respect of whom the Company conducts marketing activities or with whom the Company conducts negotiations.</p>	<ul style="list-style-type: none"> – surname, first name, and patronymic; – contact details (phone number, email address); – order content; – company name; – job title; – web analytics. 	<p>Offering of catering and other related services</p>	<p>With automation tools and without automation tools</p>	<p>Until the decision on catering and other related services is made</p>	<p>Destruction of paper documents (shredding). Deleting the data from the IT Systems</p>	<p>Data subject's consent: art.6(1)(1) of the Federal Law of the Russian Federation On Personal Data No.152-Φ3 dated 27 July 2006.</p>
<p>Guests</p> <p>The <i>Guests</i> shall mean natural persons, who are booking or have booked a room, and/or natural persons, for whom a room has been booked, and/or natural persons, to whom the Company is performing or has performed hospitality or other related services.</p>	<ul style="list-style-type: none"> – surname, first name, and patronymic; – title; – dates of stay; – time of check-in and check-out; – banking card details; – room category; – booking number; – consumer preferences; – contact details; – nationality. 	<p>Booking</p>	<p>With automation tools and without automation tools</p>	<p>Until the expiration of the limitation period (3 years) following the completion of the hospitality services and other related services</p>	<p>Destruction of paper documents (shredding). Deleting the data from the IT Systems</p>	<p>Legal obligations: p.13, 14 and 15 of the Hospitality Services Regulations of the Russian Federation (adopted by the Decree of the Russian Government dated 18 November 2020 No.1853).</p> <p>Data subject's consent: art.6(1)(1) of the Federal Law of the Russian Federation On Personal Data No.152-Φ3 dated 27 July 2006.</p> <p>Conclusion of the gift certificate purchase agreement on the initiative of the data subject or the agreement according to</p>

						which the data subject is a beneficiary: art.6(1)(5) of the Federal Law of the Russian Federation On Personal Data No.152-Φ3 dated 27 July 2006.
<p>Users</p> <p>The <i>Users</i> shall mean all data subjects whose Data shall be collected or otherwise processed with the Websites. The Guests, Customers, Contact Persons (Marketing), and other visitors have the status of the Users.</p>	<p>– cookie data; – web analytics.</p>	<p>Ensuring the functioning of the websites</p>	<p>With automation tools and without automation tools</p>	<p>Until the data subject's consent is revoked</p>	<p>Deleting the data from the IT Systems</p>	<p>Data subject's consent: art.6(1)(1) of the Federal Law of the Russian Federation On Personal Data No.152-Φ3 dated 27 July 2006.</p>
	<p>– web analytics.</p>	<p>Advertising</p>	<p>With automation tools and without automation tools</p>	<p>Until the data subject's consent is revoked</p>	<p>Deleting the data from the IT Systems</p>	<p>Data subject's consent: art.6(1)(1) of the Federal Law of the Russian Federation On Personal Data No.152-Φ3 dated 27 July 2006.</p>

- 4.4. The contact persons (marketing) shall indicate that they act in the interests of a legal entity (individual entrepreneur). If they fail to do so, the Company may treat such data subjects as the customers unless they let the Company know that they act in the interests of a legal entity (individual entrepreneur).

5. Data Processing Conditions and Procedures

- 5.1. The Company processes the Data with the use of automation tools (including computers) and without the automation tools (including on paper). The Company may perform the following actions (operations) and/or a complex of actions (operations) with the Data:
- collection;
 - record;
 - systematization;
 - accumulation;
 - storage;
 - clarification (update, change);
 - extraction;
 - use;
 - transfer (provision and access);
 - blockage;
 - deletion;
 - destruction.
- 5.2. The Company always acts based on the following assumptions:
- all Data belongs personally to the data subject or the natural person specified in the relevant message / web form;
 - each data subject visiting the Websites is an adult and legally capable person;
 - data subject provides accurate and up-to-date Data.
- 5.3. The Data shall be processed until its processing purpose is achieved or the data subject revokes his/her consent to the processing, except for the cases where the applicable laws provide for other lawful bases for continuing the data processing.
- 5.4. The data subject hereby consents to the engagement of data processors for the processing purposes specified above by concluding data processing agreements between the processors and the Company.
- 5.5. The Company shall disclose the Data to courts, law enforcement, and supervisory bodies and their officers if there are legal grounds for such disclosure established by the applicable laws.
- 5.6. The Company shall treat the Data as strictly confidential information. The Company and other persons having access to the Data shall not disclose the Data to third parties or disseminate the Data without the relevant data subject's consent unless otherwise established by a federal law.
- 5.7. According to art.18.1(2) of the Act, the Company publishes this Policy and the information about the fulfilled personal data security requirements (Appendix 1 hereto) on the Websites and ensures perpetual, unlimited, and free access to them for all data subjects.
- 5.8. The Company shall take necessary legal, organizational, and technical measures (or ensure that they are taken) for protecting the Data from unlawful or accidental access, destruction, alteration, blockage, copy, provision, dissemination, or other unlawful actions. The Data security is achieved with the following measures:

- determining data security threats during the Data processing in the IT Systems;
- applying organizational and technical measures to ensure the Data security during its processing in the IT Systems according to the data protection requirements corresponding to the data protection levels established by the Government of the Russian Federation;
- applying the information security tools that were assessed according to the prescribed procedure for compliance assessment;
- assessing the efficiency of measures taken to ensure Data security before putting the IT Systems into operation;
- keeping records of digital media;
- detecting unauthorized access to the Data and implementing the relevant measures;
- Recovering the Data modified or destroyed as a result of the unauthorized access;
- setting forth the rules for access to the Data processed in the IT Systems and ensuring the registration and record of all actions taken with regard to the Data in the IT Systems;
- controlling the taken Data security measures and the data protection level relevant for the IT Systems.

5.9. The Data processing shall be ceased upon the achievement of the processing purpose, the expiry of the consent term, the revocation of data subject's consent to the processing of his/her Data (if applicable), and the reveal of unlawful Data processing.

5.10. The Data shall be retained in a form that allows identifying a data subject no longer than it is necessary for achieving the Data processing purposes, except for the cases where the Data retention term is established by a federal law or agreement to which the data subject is a party, beneficiary, or surety.

5.11. For the purpose of catering and other related services offering, the Company shall process the Data until any of the following: 1) the Company and the Customer / Contact Person (Marketing) begin the procedure of concluding a services agreement at the data subject's initiative; or 2) one calendar year from the day when the Company received the last message from the Customer / Contact Person (Marketing); or 3) the Customer / Contact Person (Marketing) explicitly rejects the Company's offer of catering and other related services. In any of the said cases, the Company shall assume that the Data processing purpose is achieved.

5.12. The purchase and use of gift certificates shall be organized with information systems owned by TRAVEL LINE SYSTEMS LLC (address: 56A Leninsky Prospect, Yoshkar-Ola, 424003, Russia) acting on the Company's behalf. By purchasing a gift certificate, the Customer grants his/her consent to the engagement of the said entity for the processing of the Data that will be disclosed to that entity on the conditions specified in clause 4.3 hereof by the Company.

5.13. When collecting the Data, the Company shall ensure recording, systematizing, accumulating, storing, clarifying (updating, changing), and retrieving of the Data of the Russian Federation citizens with the use of the databases located in the territory of the Russian Federation except for the cases established by the Act.

5.14. The Company shall take physical security and organizational measures to ensure that the Data is stored in conditions preventing unlawful or accidental access.

6. Specific Rules on the Guest Data Processing for Bookings

6.1. The Company shall process the Guest Data with the booking system, that is an IT System, and other IT Systems. TRAVEL LINE SYSTEMS LLC (address: 56A Leninsky Prospect, Yoshkar-Ola, 424003, Russia), acting on the Company's behalf, shall maintain the functioning of the booking system. By making a booking, the Guest expresses his/her consent to the

engagement of the said entity for the processing of his/her Data (provided in the course of the booking) on the conditions specified in clause 4.3 hereof by the Company.

- 6.2. In the booking system, the Guest shall fill in the reservation application according to the template and procedure approved by the Company under p.15 of the Hospitality Services Regulations of the Russian Federation (est. by the Decree of the Russian Government dated 18. November 2020 No. 1853). The Company and the Guest shall enter into a hospitality services agreement if the Company notifies the Guest of accepting the Guest's reservation application. The Guest undertakes to fill in a registration card on the check-in. The terms and conditions of the hospitality services agreement are specified in the accepted reservation application and the registration card.
- 6.3. If a Guest wishes to specify personal data of other Guests (for whom the booking is made) in the reservation application, the Guest shall personally do the following prior to filling in the reservation application: notify other Guests of disclosing their Data to the Company and processing their Data by the Company on the conditions set forth herein; and receive consent to the processing of other Guest's Data from other Guests to the benefit of the Company. The Company shall treat the Guests specified in the reservation application as beneficiaries under the hospitality services agreement. By submitting the reservation application through the booking system, the Guest represents and warrants that he/she performed the above-mentioned actions.

7. Specific Rules on the Processing of Analytical Data and Cookies

- 7.1. The Company uses the Analytic Tools on the Websites. See: <https://yandex.ru/support/metrica/code/data-collected.html>
- 7.2. The main concept of the Analytics Tools consists of an automated collection of information about visits to the Websites and Users' actions. In particular, the Analytics Tools may retain and process information about previously-visited websites, versions and types of browsers, operating systems and User devices, language preferences, time zones, displays and other settings of the User devices, cookies, geographical regions from where the Users visit the Websites, probable Users' interests, visited webpages, time spent on the Websites, downloaded files, and other data (hereinafter jointly referred to as the **Analytical Data**).
- 7.3. The Websites are connected to the Analytics Tools strictly with a standard method prescribed by the rules of the relevant Analytics Tool. In most cases, for this purpose the program code (script) provided by an Analytics Tool shall be added to the Website program code. The scripts shall be used for the direct collection of necessary information by the Analytics Tools. The Company shall not collect and transfer information for the processing to the Analytics Tools on its own.
- 7.4. The User consents to the collection and further processing of his/her Analytical Data (as described in this Policy) by clicking the relevant button in the cookie banner (special information notice) visually demonstrated on the Websites.
- 7.5. The Company may access the Analytical Data on its accounts with the Analytics Tools. The Company is provided with the Analytical Data only in an already-processed and aggregated manner in the form of a report. The Company may process the Analytical Data only for the purposes specified in clause 4.3 hereof.
- 7.6. The Analytics Tools shall collect and, then, process the Analytical Data according to the privacy policies and rules established by these Analytics Tools and published on their websites.

- 7.7. The Company shall never disclose the User personal data that are in the Company's possession to the Analytics Tools. In particular, in no case shall the Company disclose surnames, first names and patronymics, User contact details and other similar information to the Analytics Tools. The Company shall treat the Analytical Data as confidential information and ensure its security according to this Policy.
- 7.8. The Company shall have no opportunity to influence on the Analytical Data processing. In particular, the Company neither determine the particular processing methods, nor engage the Analytics Tools as processors.
- 7.9. The Analytics Tools may use various technical instruments for receiving the Analytical Data including cookies, web beacons, IP addresses, Java scripts, and others. Among other things, the Company may use its own cookies (as described in this section).
- 7.10. The cookies are small-sized text files that are saved on devices with which the Users interact with the Websites (personal computer, smartphone, tablet, etc.). These files may contain information necessary for the Analytics Tools or the Websites. More information about the cookies is available here: <https://yandex.ru/support/browser/personal-data-protection/cookies.html?lang=en> .
- 7.11. Web beacons are graphic files having minimum size (usually 1 pixel). The Users' browsers may download files together with the Websites. Web beacons are used for receiving technical information about the User's device, for example, the operating system, time for opening and downloading the Websites, IP address, etc. Web beacons may be also used for delivering cookies to the Users' devices.
- 7.12. IP addresses are unique network addresses used for a two-way interchange of information between the Users' devices and servers on which the Websites are placed. The Analytics Tools may use IP addresses for calculating visits to the Websites and openings of webpages and performing other similar tasks.
- 7.13. Java scripts are program codes provided by the Analytics Tools and placed on websites. For example, Java script supports recording of events and actions taking place on the Websites without changing URL addresses of the Websites (for example, events that are not connected with switching between webpages or websites).
- 7.14. The Company shall use its own cookies for maintaining the normal functioning of the Websites and solving technical tasks, for example, navigation on the Websites and proper functioning of web forms, and protection from information security threats. The Users, who use the Websites, must save cookies for the said tasks. Otherwise, the normal functioning of the Websites may be disturbed. Such disturbance may, among other things, lead to information security threats (for example, facilitate hacking in respect of the Websites).
- 7.15. The description of cookies that may be received by the Users' devices is given below.

Cookie Type	Name and description of cookies	Description of cookies	Cookie Owner
Analytical	_ym_metrika_enabled	Checking the correct installation of other Yandex.Metrica cookies	.yandex.ru
	_ym_isad	Detecting ad blocks on the User's device	.yandex.ru
	_ym_uid	Distinguishing the Users	.yandex.ru
	_ym_d	Retaining the date of first visit	.yandex.ru
	yabs-sid	Visit identifier	.yandex.ru
	_ym_debug	Indicator of turning on bug fixing	.yandex.ru
	_ym_visorc_*	Webvisor correct functioning	.yandex.ru
	_ym_hostIndex	Limiting the number of requests	.yandex.ru
	i	Distinguishing the Users	.yandex.ru
	yandexuid	Distinguishing the Users	.yandex.ru
	yuidss	Distinguishing the Users	.yandex.ru
	ymex	Retaining auxiliary info of Yandex.Metrica – time of identifier creation and alternative values	.yandex.ru
	usst	Retaining auxiliary info for synchronizing user identifiers between various Yandex domains	.yandex.ru

Cookie Type	Name and description of cookies	Description of cookies	Cookie Owner
Technical	PHPSESSID	Saving the user session status for various page requests	Company
	BX_USER_ID	Cookie CMS Bitrix	Company
Analytical	_ym_metrika_enabled	Verifying the correctness of other Yandex.Metrica cookies installation	.yandex.ru
	_ym_isad	Detecting ad blocks on the User's device	.yandex.ru
	_ym_uid	Distinguishing the Users	.yandex.ru
	_ym_d	Retaining the date of first visit	.yandex.ru
	gdpr	Detecting users from regions where the General Data Protection Regulation (GDPR) applies	.yandex.ru
	is_gdpr	Detecting users from regions where the General Data Protection Regulation (GDPR) applies	.yandex.ru
	is_gdpr_b	Detecting users from regions where the General Data Protection Regulation (GDPR) applies	.yandex.ru
	yabs-sid	Visit identifier	.yandex.ru
	_ym_debug	Indicator of turning on bug fixing	.yandex.ru
	_ym_visorc_*	Webvisor correct functioning	.yandex.ru
	_ym_hostIndex	Limiting the number of requests	.yandex.ru
i	Distinguishing the Users	.yandex.ru	
yandexuid	Distinguishing the Users	.yandex.ru	

yuidss	Distinguishing the Users	.yandex.ru
ymex	Retaining auxiliary info of Yandex.Metrica – time of identifier creation and alternative values	.yandex.ru
usst	Retaining auxiliary info for synchronizing user identifiers between various Yandex domains	.yandex.ru
spravka	Protecting Yandex against robots	.yandex.ru
bh		.yandex.ru
TLBF_ru	Cookie of TravelLine booking engine.	TravelLine
user_key	Analytical cookie of Yandex.Metrica	Yandex Metrica
_gat_TlGaTracker1	Cookie of TravelLine booking engine.	TravelLine
_gat_TLAnalytics1	Cookie of TravelLine booking engine.	TravelLine
_ym<counter number>_lastHit	Clarifying time when determining the precise number of rejections	.yandex.ru
_ym<counter number>_lsid	Distinguishing the Users	.yandex.ru
_ym<counter number>_reqNum	Determining the counting number of request of Metrica counter in browser	.yandex.ru
_ym_retryReqs	Containing requests that have not been delivered to the server	.yandex.ru
zz	Distinguishing the Users	.yandex.ru

- 7.16. The User shall have the right to reject the cookies or other web analytical instruments on his/her device at his/her discretion. For this purpose, the User may either refrain from using the Websites, or apply the relevant settings to his/her browser. Most of modern browsers and internet security software support the full, partial, or selective blockage of cookies and other technical instruments used for collecting the Analytical Data as well as the deletion of previously saved cookies. For this reason, it is recommended that the User checks through the security settings on his/her device and personally choose the preferable options. Each browser may have its own settings. The User shall read section *Help* or *Info* in his/her browser and check the firewall settings (if any). The Company does not guarantee that the User will be able to use all functions of the Website perpetually if the User rejects cookies and other technical instruments.

The descriptions of settings for the most common browsers are available here:

Google Chrome: <https://support.google.com/chrome/answer/95647>

Microsoft Edge: <https://support.microsoft.com/ru-ru/help/4468242/microsoft-edge-browsing-data-and-privacy-microsoft-privacy>

Yandex Browser: <https://browser.yandex.ru/help/personal-data-protection/personal-data-protection.html>

- 7.17. The guidance on how to reject Yandex.Metrica is available here: <https://yandex.ru/support/metrica/general/opt-out.html?lang=en> .

- 7.18. For purpose of advertising, the Company may set up advertising instruments using the Analytical Data in social networks and other web resources provided that the Company complies with the terms of use and privacy policies adopted by the social networks and the relevant web resources. This will help the User to see advertisements for the services offered on the Websites. The Company never processes the Analytical Data for promoting products, works, and services on the market with direct contacts with potential customers via communication tools. The Users hereby consent to the transfer of the Analytical Data for the purpose of advertising from the Company to the owners of the relevant social networks and other web resources that will process the Analytical Data as independent operators according to the privacy policies adopted by them provided that the relevant conditions established by law will be observed.

8. Actualization, Amendment, Deletion, and Destruction of Data and Replies to Data Subjects' Data Access Requests

- 8.1. If it is revealed and confirmed that the Data is inaccurate or processed illegally, this Data shall be updated or the processing shall be terminated, correspondingly.
- 8.2. The Data shall be destroyed upon achieving the Data processing purposes or revoking the data subject's consent provided that
- contract to which the data subject is a party, beneficiary, or surety does not provide otherwise; or
 - Company has no right to process the Data based on the Act or other federal laws (without the data subject's consent); or
 - other agreement between the Company and the data subject provides otherwise.
- 8.3. The Company must provide the information about the processing of personal data at the request of the data subject or his/her representative.

9. Rules on Responding to Inquiries/Requests of Data Subjects, Their Representatives, and Competent Authorities Concerning Inaccuracy of Personal Data, Unlawful Processing, Recall of Consent, and Data Subject's Access to His/Her Data

- 9.1. Data subjects shall have the right to obtain information concerning the processing of their Data.

Among other things, such information shall contain

- Confirmation of the fact that the Company processes the Data;
- Lawful bases and purposes of the Data processing;
- Data processing methods used by the Company;
- Name and location of the Company, information about the persons who have access to the Data or to whom the Data may be disclosed under an agreement with the Company or under a federal law;
- The Data being processed and relating to the relevant data subject, its source, unless another procedure for such data presentation is provided for by a federal law;
- Time periods of the Data processing, including retention periods;
- Procedure for exercise by a data subject of his/her rights established by the personal data laws of the Russian Federation;
- Information on the completed or proposed cross-border Data transfers;
- Name of the legal entity or first name, patronymic, last name, and address of the processor on behalf of the Company, if such processing is or will be assigned to such person;
- Information on how the Company performs the obligations established by art.18.1 of the Act;
- Other information established by the personal data laws of the Russian Federation.

To receive this information, the data subjects shall contact the Company according to the contact details specified in clause 9.14 below.

- 9.2. Data subjects may demand that the Company update, block, or destroy their Data if the Data is incomplete, outdated, inaccurate, illegally obtained or is not necessary for the declared processing purpose, and may use legal remedies for protecting their rights.
- 9.3. The above information shall be provided by the Company to a data subject in an accessible form and it shall not comprise the Data relating to any other data subjects, unless there are lawful bases to disclose such Data.
- 9.4. The information specified in this Section shall be communicated to a data subject or his/her representative, and he/she may familiarize with his/her Data when inquiring or within 10 business days from the date when the request was received from such data subject or his/her representative. The said term may be prolonged for no longer than 5 business days if the Company sends a motivated notice of the reasons for the prolongation to the data subject. The inquiry shall contain:
 - Number of the main identity document of the data subject or his/her representative, information about the date of issue of the said document and the issuing authority;
 - Information confirming the participation of the data subject in the legal relations with the Company or information otherwise confirming the actual data processing by the Company and a signature of the data subject or his/her representative. The inquiry may be sent as an electronic document and signed by means of an electronic signature according to the laws of the Russian Federation.
- 9.5. If the information specified in this Section and the Data being processed were provided to a data subject to familiarize with upon his/her inquiry, the data subject may send a request to the Company again or send a repeated inquiry in order to obtain the said information and familiarize with such Data no earlier than thirty days after the initial request or inquiry, unless a shorter period is prescribed by a federal law, a regulation adopted in accordance therewith, or an agreement, to which the data subject is a party, beneficiary, or surety.

- 9.6. The data subject may send a request to the Company again or send a repeated inquiry in order to obtain the above information and familiarize with the Data being processed before the expiry of the period specified in the previous clause, unless such information and/or Data being processed is provided to him/her for familiarization in full after the consideration of his/her initial request. The repeated inquiry shall contain an explanation of sending this repeated inquiry.
- 9.7. The Company may refuse to fulfil the data subject's repeated inquiry not compliant with the terms and conditions set forth by law. Such refusal shall be reasoned.
- 9.8. The right of a data subject to access his/her Data may be restricted in accordance with federal laws, in particular, if such access of the data subject to his/her Data infringes the rights and legitimate interests of any third parties.
- 9.9. The Company shall provide Roscomnadzor, upon its request, with the necessary information within 10 business days after receiving such request.
- 9.10. All incoming requests and inquiries shall be registered as incoming correspondence and recorded in the relevant registers of the Company.
- 9.11. The requests and inquiries shall be considered by the Data Protection Officer. If there are any questions or it is necessary to clarify the inquiry, the Data Protection Officer shall contact the person who sent the inquiry/request using the contact information contained in such inquiry/request.
- 9.12. The reply to a request / inquiry shall be executed in the same way as the relevant request / inquiry (e.g., by email or in writing) unless otherwise explicitly prescribed by the laws of the Russian Federation or the data subject asks otherwise in his/her request / inquiry.
- 9.13. A response to the inquiry of a data subject shall be signed by the Data Protection Officer or the General Director. A response to the request of Roscomnadzor shall be signed by the General Director or the person acting under the Company's power of attorney and according to the General Director's instructions. The replies to requests and inquiries shall be registered and recorded in the relevant registers of the Company.
- 9.14. There is no particular format for a request / inquiry. A request / inquiry shall be submitted to
Europe Hotel LLC
Attn: Data Protection Officer
Postal address: 1/7 Mikhailovskaya street, St Petersburg, 191011, the Russian Federation.

Appendix. Information about Fulfilled Personal Data Security Requirements

As necessary and subject to the threats relevant to the IT Systems used for the processing of the Data by the Company, the Company shall comply with the following Data security requirements of the third level of personal data security (or ensure their implementation by third-party processors):

- (a) Ensures the security of premises accommodating the IT systems to prevent any person without appropriate access rights from uncontrolled intrusion or stay in these premises;
- (b) Ensures the safety of data media;
- (c) Adopts the list of employees whose work duties require access to the personal data processed in the IT Systems (by a CEO's decision);

- (d) Uses information security tools that passed the assessment of compliance with the information security legislation of the Russian Federation (when such tools are necessary for the neutralization of actual threats);
- (e) Appoints an employee as a data security officer for the IT Systems.