APPROVED CEO LLC «Hotel« Volgo-Don » o/s M.V. Davydova "14" July 2010

POLICY

concerning the processing of personal data in LLC "Hotel" Volgo-Don "

In the course of carrying out its statutory activities, the Limited Liability Company "Hotel Volgo-Don" (hereinafter referred to as the "Company") processes personal data. By carrying out the processing of personal data (hereinafter - PDD) of Employees, Clients and other individuals, the Company is responsible for maintaining the confidentiality and safety of the personal data being processed.

This Policy was developed in accordance with the Convention on the Protection of Individuals with regard to the automated processing of personal data (concluded in Strasbourg on 28.01.1981), the Constitution of the Russian Federation (adopted by popular vote on 12.12.1993), Federal Law of 27.07.2006 No. 152-FZ "On Personal Data", Federal Law No. 149-FZ of July 27, 2006 "On Information, Information Technologies and Information Protection" and other normative acts in the field of processing and protection of personal data operating in the territory Russian Federation

This Privacy Policy at LLC "Volgo-Don Hotel" Establishes general rules and procedures regarding the observance of confidentiality and the protection of personal data.

This Policy applies to all cases of personal data processing by the Company, regardless of whether the processing of personal data is automated or manual.

This Policy is an internal local normative act of the Company and is mandatory for all employees of the Company.

1. Basic concepts

- hotel an organization that provides hotel services to the client;
- Customer an individual, a consumer of hotel services, a subject of personal data;
- hotel services actions of the Hotel for accommodation of Clients in the accommodation facility, as well as other activities related to accommodation and accommodation, which includes basic and additional services provided to the Client;
- personal data any information related directly or indirectly to a certain or determined individual (subject of personal data);
- processing of personal data any action with personal data, carried out with the use of automation or without the use of such means;
- an employee of LLC "Hotel Volgo-Don" an individual (subject of personal data) who has entered into a labor contract with the Company.

2. Basic Provisions

Hotel guests' data are necessary for registration and registration in the accommodation system.

In accordance with the Rules for the provision of hotel services in the Russian Federation, approved by the Decree of the Government of the Russian Federation of April 25, 1997. No. 490, the contract for the provision of services is concluded upon presentation by the consumer of a passport or military ticket, identity card, other document issued in accordance with the established procedure and confirming the identity of the consumer

3. Transfer of personal data

The hotel does not provide or disclose information containing personal data of consumers of hotel services to a third party without the written consent of the personal data subject, unless it is necessary to prevent a threat to life and health, as well as in cases established by federal laws. On a motivated request, personal data without the consent of the subject of personal data can be transferred:

- to the judiciary in connection with the administration of justice;
- to the state security bodies;
- to the prosecutor's office;
- to the police;
- to investigative bodies;
- to the migration service;
- to other bodies in cases stipulated by regulatory legal acts that are binding for execution.

Personal data of clients required for the implementation of the legislation of the Russian Federation:

- Surname, name, patronymic (if available);
- Year, month and date of birth;
- Place of Birth;
- Citizenship;
- Sex:
- Passport data (series, passport number, by whom and when issued, validity period);
- Terms of stay in the hotel;
- -Data visas (series, number, identifier, validity period, category, multiplicity and purpose of the visa);
- -Migration card data (series, number, expiration date, by whom issued).

Access to personal data is obtained only by those employees of LLC "Hotel" Volgo-Don ", to whom they are needed for the performance of their duties. All of them get access to personal data after signing a confidentiality agreement and familiarization with the procedure for processing personal data.

Employees of the hotel do not answer questions related to the transfer of personal data by phone or fax.

4. Protection of personal data of Clients from unauthorized access

4.1. When processing personal data of the Client, the hotel takes necessary organizational and technical measures to protect personal data from unauthorized or accidental access to it,

destruction, modification, blocking, copying, distribution of personal data, as well as from other illegal actions

- 4.2. Observe the procedure for obtaining, accounting and storage of personal data of customers;
- 4.3. Applies technical means of protection, signaling;
- 4.4. Concludes with all employees associated with the receipt, processing and protection of the Customer's personal data, the Agreement on the non-disclosure of the Customer's personal data;
- 4.5. He brings to disciplinary responsibility employees guilty of violating the rules governing the receipt, processing and protection of personal data of the Client.
- 4.6. Documents containing personal data of the Customers are stored in the premises of the Placement Service, providing protection from unauthorized access.
- 4.7. Protection of access to electronic databases containing personal data of customers is provided by:
- use of licensed software products that prevent unauthorized access by third parties to personal data of customers;
- system of passwords. Passwords are set by the system administrator and communicated individually to employees who have access to personal data of the Clients.
- 4.8. Copy and make statements of the Customer's personal data is allowed only for official purposes with the written permission of the manager

5. Duties of the Hotel

5.1. The hotel is obliged:

To process the personal data of the Clients solely for the purpose of providing legal services to the Clients.

- 5.1.1. Receive the personal data of the Customer directly from himself. If the Customer's personal data can only be obtained from a third party, the Client must be notified of this in advance and a written consent must be obtained from him. Employees of the Hotel must inform the Clients about the purposes, prospective sources and methods of obtaining personal data, as well as the nature of the personal data to be received and the consequences of the client's refusal to give written consent to receive them.
- 5.1.2. Do not receive or process personal data of the Client about his race, nationality, political views, religious or philosophical beliefs, health or intimate life, except as provided by law.
- 5.1.4. To provide access to his personal data to the Client or his legal representative at the request or on receipt of a request containing the number of the main identity document of the Client or his legal representative, information on the date of issue of the said document and the issuing body and the signature of the Client or his legal representative. The request can be sent in electronic form and signed by an electronic digital signature in accordance with the legislation of the Russian Federation. Information about the availability of personal data must be provided to the Client in an accessible form and they should not contain personal data relating to other personal data subjects.

6. Customer Rights

The customer has the right to:

• access to information about yourself, 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 persons who have access to or are allowed access to personal data; the

list of processed personal data and the source of their receipt, the processing time 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;

- determining the forms and methods of processing his personal data;
- limiting the ways and forms of processing personal data;
- a ban on the distribution of personal data without his consent;
- change, refinement, destruction of information about oneself;
- Appealing illegal actions or omissions on the processing of personal data and appropriate compensation in court.

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

- 7.1. The hotel is responsible for the personal information that is at its disposal and fixes the personal responsibility of employees for compliance with the established privacy regime. Every employee who receives a document containing personal data of the Client for work is solely responsible for the safety of the media and the confidentiality of information.
- 7.2. Any person can apply to the hotel employee 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.
- 7.3. Employees of the Hotel are obliged, at a proper level, to ensure the consideration of requests, applications and complaints from the Clients, as well as to promote compliance with the requirements of the competent authorities.
- 7.4. Persons guilty of violating the rules governing the receipt, processing and protection of personal data of the Clients shall be subject to disciplinary, administrative, civil or criminal liability in accordance with federal laws.