

*Individual entrepreneur  
Mamontov D.A.*

*APPROVED BY*

*Mamontov D.A*

**REGULATION**

**ON PROTECTION OF GUEST PERSONAL DATA**

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## 1. GENERAL PROVISIONS

### 1.1 Purpose

This Regulation on protection of guest personal data (hereinafter – the Regulation) regulates the procedure of the processing of personal data of the Guests that receive services provided by Mamontov D.A. (hereinafter – the Guest house) on reception and accommodation in Guest house.

The Regulation is aimed to provide protection of the rights and freedoms of a person and citizen while processing his/her personal data.

Personal data are processed in order to implement the agreement on provision of accommodation or temporary accommodation services with the Guest being one of the parties thereto. The Guest house collects personal data in the amount needed to achieve the above purpose.

Personal data are not used to inflict any property and moral damage to the citizens or to hinder exercise of the rights and freedoms of the Russian Federation citizens.

### 1.2 Involved Services

The requirements of the Regulation are binding on all employees having access to the Guests' personal data.

### 1.3. Regulatory Documents

The Regulation is governed by the regulatory documents listed in Table 1.

*Table 1*

No.	Regulatory document
<i>External</i>	
1	Constitution of the Russian Federation
2	Federal law "On Information, Information Technologies and Information Security" No.149-FZ of 27 July 2006
3	Federal law "On personal data" No.152-FZ of 27 July 2006
<i>Internal</i>	
1	Guest house Charter

### 1.4. Terms and Abbreviations

Terms, definitions and abbreviations used in this Regulation are listed in Table 2.

*Table 2*

Term (Abbreviation)	Definition
the Guest house	an organization providing the client with Guest house services
the Guest	an individual, a consumer of Guest house services, a subject of personal data;

<b>Term (Abbreviation)</b>	<b>Definition</b>
Guest house services	actions of the Guest house on accommodation of the Guests in the accommodation facility, as well as other activities related to reception and accommodation, which includes basic and additional services provided to the Guest;
Use of personal data	actions (operations) with personal data performed by the operator in order to make decisions or perform other actions engendering legal consequences in relation to the subject of personal data or other persons or in any other way affecting the rights and freedoms of the subject of personal data or other persons;
Confidentiality of personal data	the requirement that the operator or other persons who have access to personal data are obliged to comply with the requirement not to allow their distribution without the consent of the subject of personal data or the availability of other legal grounds;
Personal data processing	actions (operations) with personal data including collection, systematization, accumulation, storage, refinement (update, modification), use, distribution (including transfer), depersonalization, blocking, destruction of personal data;
Personal data	information saved in any format referring to a particular or identified individual (subject of personal data) which makes it possible to identify the Guest either by itself or in combination with any other information held by the Guest house;
Distribution of personal data	any actions aimed at transfer of the personal data to a certain group of persons (transfer of personal data) or at personal data being viewed by an unlimited range of persons, including publishing personal data in mass media, posting thereof in the information and telecommunication networks or otherwise granting access to personal data;
Registration card	a document containing information on the guest, consent to personal data processing and serving as an agreement between the Guest house and the Guest

## 2. REGULATION CONTENT

### 2.1. Content and Reception of the Guests' personal Data

2.1.1 The Guest house collects and processes the following personal data:

- personal details (last name, first name, patronymic, year of birth, month of birth, date of birth, etc.);
- nationality;

- gender;
- passport details;
- registration address;
- residential address;
- details of the document (Visa) confirming the right to stay in the Russian Federation;
- Migration Card;
- contact phone number;
- e-mail;
- place of employment (when making reservation of legal entities' assignees)

2.1.2 the Guest house employees receive all personal data directly from the subject of personal data - Guests and/or their legal representatives, legal entities (when making reservation of legal entities' assignees). Consent for personal data processing are taken by receipt from the Guest of the Guest Registration Card filled in with his/her own hand, or in the form of performing by the personal data subject of the implicative actions at the Guest house Website.

2.1.3 Consent is not required in the case if

- personal data processing is required to achieve the purposes stipulated by an international agreement of the Russian Federation or by a law, or for exercise and fulfillment of functions, powers and obligations imposed on operators by the Russian Federation law;
- personal data processing is required for administration of justice or enforcement of a judicial act or an act of another body or official which are enforceable in accordance with the legislation of the Russian Federation concerning enforcement proceedings (hereinafter - enforcement of a judicial act);
- personal data processing is required for rendering state or municipal services in accordance with the Federal law of 27 July 2010 No.210-FZ "On provision of state and municipal services", for ensuring the provision of this service or for registration of personal data subjects on the uniform portal of state and municipal services;
- personal data processing is required for performance of an agreement to which a personal data subject is a party or under which the data subject is a beneficiary or surety, or for conclusion of an agreement on the initiative of a personal data subject or an agreement under which a personal data subject shall be a beneficiary or surety;
- personal data processing is required for protection of life, health or other vital interests of the personal data subject in case it is not possible to obtain his/her consent;
- processing of personal data is required for realization of the rights and legitimate interests of an operator or third parties or for the attainment of socially significant objectives, provided that this not cause the rights and freedoms of the personal data subject to be violated;
- processing of personal data is required for the purposes of professional activities of a journalist and (or) the legitimate activities of a mass medium or for the purposes of

scientific, literary or other creative activity, provided that this not cause the rights and freedoms of the personal data subject to be violated;

- public access to the personal data being processed has been granted by or at the request of the personal data subject (hereinafter - personal data made public by the personal data subject);
- personal data being processed are subject to publication or compulsory disclosure in accordance with federal laws.

**Responsible employee:** *Mamontov D.A*

## **2.2. Processing and Storage of Guests' personal data**

2.2.1 Processing of personal data by the Guest house for the benefit of the Guests imply receipt, systematization, accumulation, storage, refinement (update, modification), use, distribution (including transfer), depersonalization, blocking, deletion of personal data and protection thereof against unauthorized access.

2.2.2 The Guest's consent to personal data processing are taken as the personal data are processed for the purposes of execution of the agreement to which the Guest, being the personal data subject, is a party.

2.2.3 Guests' personal data are processed by a mixed processing method (manual and automated).

2.2.4. Only employees of the Guest house, who need it to perform their job duties, can access the processing of personal data of the Guests.

2.2.5 Guests' personal data in hard copies are kept by the Guest house's Front Office.

2.2.6 Guests' personal data in electronic format are stored in the local computer network of the Guest house, in electronic folders and files on personal computers of the Front Office and of the employees who require such access to perform their employment duties.

2.2.7 Personal data of the Guests are stored and processed within one year from the date of departure of Guests from the Guest house.

2.2.8 Personal data in the information systems, on machine-readable and paper carriers are destroyed within 30 (thirty) calendar days from the day of achievement of the processing goal (storage life) of personal data. Personal data are destroyed by a specially appointed commission with the obligatory drawing up of an act.

**Responsible employee:** *Mamontov D.A.*

## **2.3. Use and Transfer of the Guests' personal data**

2.3.1 The use of personal data of the Guests is carried out only by authorized employees of the Guest house solely for the achievement of the goals defined by the agreement between the Guest and the Guest house, in particular, for the provision of accommodation and temporary accommodation services, as well as additional services.

2.3.2 When transferring personal data of the Guests of the Guest house should follow the requirements

stated below:

2.3.2.1. To warn the persons who receive the personal data of the Guests that such data may be used solely for the purposes they were disclosed for, and to request the specified persons to confirm that this regulation is complied with. Persons who receive personal data of the Guests shall comply with the confidentiality policy. This provision doesn't apply to personal data depersonalization and to the publicly available data.

2.3.2.2. To provide access to the Guests' personal data to the specially authorized personnel, who are entitled to obtain only the personal data required to fulfil specific functions.

2.3.2.3. It is not allowed to answer any questions related to the transfer of the information containing personal data over the phone or by fax.

2.3.3. The Guest house has the right to provide or transfer the personal data of the Guest to third parties in the following cases:

- if the disclosure of this information is required to comply with the law, the judicial act;
- to assist in investigations conducted by law-enforcement or other public authorities;
- to protect the legitimate rights of the Guest and the Guest house.

**Responsible employee:** *Mamontov D.A*

## **2.4 Guests' personal data protection against unauthorized access**

2.4.1 Upon the Guests' personal data processing the Guest house should take necessary organizational and technical measures to protect the personal data against unauthorized or accidental access, destruction, modification, blocking, copying, distribution of personal data, as well as from other illegal actions.

2.4.2 To ensure efficient protection of the Guests' personal data, it is necessary:

2.4.2.1 To follow the procedure for receipt, registration and storage of the Guests' personal data;

2.4.2.2 To apply technical security and alarm equipment;

2.4.2.2 To take disciplinary action against the employees guilty of violation of standards regulating receipt, processing and protection of personal data of the Guest.

2.4.3 It is prohibited to grant access to the Guests' personal data to employees who are not directly involved in activities related to the Guests' personal data.

2.4.4. Documents containing personal data of the Guests shall be stored in the premises of the Accommodation Service which ensure unauthorized access protection.

2.4.5 Protection of access to electronic databases containing personal data of the Guests is ensured by

- use of licensed software products that prevent unauthorized third-party access to the personal data of the Guests;

- password system. The passwords are set by IT-service and are personally disclosed to employees having access to the Guests' personal data.

2.4.6 Copying and making extracts from the Guest's personal data are allowed only for work-related purposes with the permission of the *Mamontov D.A*

**Responsible employee:** *Mamontov D.A*

## **2.5 Responsibilities of the Guest house**

The Guest house shall be obliged to:

2.5.1 Process personal data of the Guests solely for the purposes of rendering legal services to the Guests.

2.5.2 Obtain the Guest's consent for personal data processing directly from the Guest himself.

2.5.3 Refrain from receiving and processing the Guest's personal data concerning his/her race, ethnic origin, political views, religious or philosophical beliefs, state of health, intimate life, except as required by law.

2.5.4 Provide access to his/her personal data to the Guest or to his/her legal representative when applying for or receiving a request containing the number of the basic ID document, its issue date and issuing authority and handwritten signature. The request may be sent by e-mail and signed by an electronic digital signature in accordance with the legislation of the Russian Federation. Information on the available personal data should be presented to the Guest in an intelligible form and it should not contain personal data relating to any other personal data subjects.

2.5.5 Restrict the Guest's right to access to his/her personal data if:

- the processing of personal data, including personal data obtained as a result of investigative, counter-intelligence and intelligence activities, is carried out for the purposes of national defense, state security and the maintenance of public order;
- the processing of personal data is carried out by the bodies which have detained the personal data subject on suspicion of committing a crime, or have brought a criminal charge against the personal data subject, or have imposed a measure of restraint against the personal data subject prior to bringing charges, except in cases provided for in the criminal procedure legislation of the Russian Federation where a suspect or accused person is permitted to inspect such personal data;
- provision of personal data causes the rights and freedoms of other persons.

2.5.6 Ensure that the Guest's personal data are safely stored and protected against their unlawful use or loss.

2.5.7 In case of detection of inaccurate personal data or illegal actions with them when requesting or at the request of the subject of personal data or his/her legal representative or authorized body to protect the rights of personal data subjects, the Guest house is obliged to

block personal data relating to the relevant subject of personal data, from the moment of such request or receipt of such a request for the period of verification;

2.5.8 In case of confirmation of the fact of inaccuracy of personal data, the Guest house on the basis of documents submitted by the personal data subject or his/her legal representative or authorized body to protect the rights of personal data subjects, or other necessary documents is obliged to clarify personal data and remove their blocking.

2.5.9 In case of detection of illegal actions with personal data, the Guest house, within a period not exceeding three working days from the date of such identification, is obliged to eliminate the violations. If the violations are impossible to be rectified within a period not exceeding three working days from the date of unlawfulness of actions with personal data, the operator is obliged to destroy personal data.

2.5.10 Destruct the Guest's personal data if:

- the Operator achieved the purpose of personal data processing;
- the Guest revoked consent or processing his/her personal data.

Personal data must be destructed within three days following the specified time: in hard copies – by shredding, on electronic media – by physical destruction of the electronic medium or by the way of software destruction (to be performed using special software).

**Responsible employee:** *Mamontov D.A*

## **2.6 Rights of the Guest**

Guest has the right to:

- access to information about him/herself, including the information confirming the fact of the processing of personal data, as well as the purpose of such processing; methods of personal data processing applied by the Guest house; information about persons who have access to personal data or who may be granted such access; the list of processed personal data and the source of their receipt, the processing time of personal data, including the storage period; information what legal consequences for the Guest may entail processing of his/her personal data;
- determination of forms and methods of processing his/her personal data;
- restriction of methods and forms of personal data processing;
- prohibition on distribution of personal data without his/her consent;
- modification, refinement, destruction of information about him/herself;
- filing a complaint against wrongful actions or omissions related to the processing of personal data and compensation through the courts.

## **2.7 Confidentiality of the Guests' personal data**



- 2.7.1 Information regarding the Guests' personal data shall be deemed confidential.
- 2.7.2 The Guest house ensure confidentiality of the personal data and prevent distribution thereof to any third parties without the Guests' consent or any other available legal ground.
- 2.7.3 Persons having access to the Guests' personal data should comply with the confidentiality policy and they should be informed on the need to comply with the confidentiality policy. Due to non-disclosure requirements applicable to the personal information the respective safety measures should be provided for to protect the data against accidental or unauthorized destruction, accidental loss or against unauthorized access to, modification or distribution of such data.
- 2.7.4 All confidentiality measures when collecting, processing and storing personal data of the Guests apply to all information carriers, both physical and automated.
- 2.7.5 Unless otherwise required by law, personal data confidentiality mode is released in case if such personal data are depersonalized or included into the publicly available personal data sources.

**Responsible employee:** *Mamontov D.A*

## **2.8 Reporting**

- 2.8.1 When proceeding and storage of personal data reporting is not provided.

## **2.9 Responsibility**

- 2.9.1 The Guest house is responsible for the personal information that is at its disposal and establishes the personal responsibility of staff for compliance with the established confidentiality policy.
- 2.9.2 Each employee who receives a document containing the personal data of the Guest for work is solely responsible for the safety of the media and confidentiality of information.
- 2.9.3 Any person may contact the Guest house employee with a complaint of violation of this Regulation. Complaints and applications for compliance with data processing requirements are considered within 3 days from the date of receipt.
- 2.9.4 Employees of the Guest house are obliged to ensure consideration of requests, statements and complaints of the Guests, as well as facilitate the execution of the requirements of the competent authorities.
- 2.9.5 Persons guilty of violating the rules governing the receipt, processing and protection of the Guests' personal data are subject to disciplinary, administrative, civil or criminal liability in accordance with federal laws.
- 2.9.6 Divulgence or public disclosure of personal data, loss of documents and other media containing personal data, as well as any other breaches of the obligations relating to the

protection and processing thereof set forth by this Regulation cause disciplinary penalty to the employee having access to personal data, i.e. a reprimand, warning or dismissal.

2.9.7 An employee having access to personal data who committed the said disciplinary offence bears full financial liability if his/her actions caused damage to the employer (clause 7 of article 243 of the Labor Code of the Russian Federation).