#### PRIVACY POLICY

This Personal Data Privacy Policy (hereinafter referred to as the Privacy Policy) applies to all information that OOO Dudnik (hereinafter referred to as the Operator) can obtain about the User while using the Operator's website villaelenahotel.ru (hereinafter referred to as the Website).

#### 1. DEFINITION OF TERMS

- 1.1 This Privacy Policy uses the following terms:
- 1.1.1. Website Administration are employees authorized to manage the website, acting on behalf of OOO Dudnik, who organize and (or) carry out the processing of personal data, determine the purposes of processing personal data, the composition of personal data to be processed, and actions (operations) committed with personal data.
- 1.1.2. Personal data are any information relating directly or indirectly to a specific or identifiable individual (subject of personal data).
- 1.1.3. Processing of personal data is any action (operation) or a set of actions (operations) performed with or without the use of automation tools with personal data, including collection, recording, systematization, accumulation, storage, clarification (updating, changing), extraction, use, transfer (distribution, provision, access), blocking, deletion, destruction of personal data.
- 1.1.4. Privacy of personal data is a mandatory requirement for the Operator or another person who has gained access to personal data to prevent their distribution without the consent of the subject of personal data or other legal grounds.
- 1.1.5. Website User (hereinafter referred to as the User) is a person who has access to the Website via the Internet and uses the services of the Operator's Website.
- 1.1.6. A cookie is a small piece of data sent by a web server and stored on the User's computer, which the web client or web browser sends to the web server in an HTTP request each time it tries to open a page of the corresponding website.

# 2. GENERAL PROVISIONS

- 2.1. The use of the Website by the User means acceptance of this Privacy Policy and the terms of processing the User's personal data.
- 2.2. In case of disagreement with the terms of the Privacy Policy, the User must stop using the Website.
- 2.3. This Privacy Policy applies only to the Operator's Website. The Operator does not control and is not responsible for the websites of third parties, to which the User can follow the links available on the Operator's Website.
- 2.4. The Website Administration does not verify the accuracy of personal data provided by the User of the Operator's Website.

#### 3. SUBJECT OF THE PRIVACY POLICY

3.1. This Privacy Policy establishes the obligations of the Website Administration not to disclose and ensure the privacy of personal data that the User provides when booking through the Website, submitting a CV through the Website, or sending messages via the Online Consultant service on the Website.

- 3.2. Personal data covered by this Privacy Policy may include the following (depending on the purposes for which personal data is provided):
- 3.2.1. surname, name, patronymic of the User (and/or persons represented by them);
- 3.2.2. phone number of the User;
- 3.2.3. email;
- 3.2.4. citizenship;
- 3.2.5. place of residence;
- 3.2.6. payment details;
- 3.2.7. marital status;
- 3.2.8. information about education and work experience;
- 3.2.9. passport data;
- 3.2.10. other information.
- 3.3. Use of cookies.
- 3.3.1. Cookies collect information such as browser type, duration of access to the Online Services, pages viewed, request source URL, language preference, and other aggregated network traffic data. Our contractors and we use this information for security purposes, ease of navigation, more efficient presentation of information, collection of statistical data, and personalization of service.
- 3.3.2. Cookies also allow us to determine which of our advertisements or offers are more likely to appeal to you and to show them when you use the Online Services or send them in announcements and marketing communications. In addition, we may use cookies and other technologies to track response to our online advertising and marketing communications. If you do not want cookies to collect information, please follow the simple settings provided in most browsers to disable cookies or choose whether certain cookies from certain websites should be stored on your computer.

### 4. PURPOSE OF COLLECTING USER'S PERSONAL DATA

- 4.1. The Website Administration may use the User's personal data for the following purposes:
- 4.1.1. Provide requested services, such as sending confirmation or advance messages, assisting with events, and providing other information about the area and the Hotel.
- 4.1.2. Make reservations and arrange your stay at the Hotel, such as processing payment, ensuring that the correct room category and service level is available.
- 4.1.3. Send administrative information, advertisements, and special offers, conduct periodic customer satisfaction surveys, market research or quality surveys.
- 4.1.4. Provide personalized service while staying at the Hotel, offering you products and services that meet your needs.
- 4.1.5. Provide you with the opportunity to participate in lotteries, contests and other promotions, as well as carry out them.
- 4.1.6. For the purposes of audit, security, monitoring, development of new products, improvement of services, identification of trends in the use of network resources, determination of the effectiveness of advertising campaigns.
- 4.1.7. As part of the development, updating and implementation of the Hotel's loyalty program.
- 4.1.8. To consider a candidate for the position you are looking for (when you submit your CV through the appropriate form on the Website).

4.1.9. To provide consulting support through the "Online Consultant" service on the Website.

### 5. METHODS AND TERMS OF PROCESSING PERSONAL DATA

- 5.1. The User's personal data is processed without time limit, in any legal way, including in personal data information systems using automation tools or without using such tools.
- 5.2. The User's personal data may be transferred to the authorized state authorities of the Russian Federation only on the basis and in the manner established by the legislation of the Russian Federation.
- 5.3. In case of loss or disclosure of personal data, the Website Administration informs the User about the loss or disclosure of personal data.
- 5.4. The Website Administration takes the necessary organizational and technical measures to protect the User's personal data from unauthorized or accidental access, destruction, modification, blocking, copying, distribution, as well as from other illegal actions of third parties.
- 5.5. The Website Administration, together with the User, takes all necessary measures to prevent losses or other negative consequences caused by the loss or disclosure of the User's personal data.
- 5.6. The User has the right to withdraw consent to the processing of personal data at any time by sending a written notice to the address: 298600, Russian Federation, Republic of Crimea, Yalta, Glavpochtamt (Central Post Office), P.O.B. # 400, marked "The withdrawal of consent to the processing of personal data."

#### 6. OBLIGATIONS OF THE PARTIES

#### 6.1. The User is obliged to:

- 6.1.1. Provide the required personal data when booking or submitting a CV (candidate profile) for the desired position.
- 6.1.2. Update, supplement the provided personal data in case of changes in this information.

# 6.2. The Website Administration is obliged to:

- 6.2.1. Use the information received solely for the purposes specified in clause 4 of this Privacy Policy.
- 6.2.2. Ensure that confidential information is kept secret, not disclosed without the prior written permission of the User, and also not to sell, exchange, publish or disclose in other possible ways the personal data provided by the User, with the exception of clause 5.2 of this Privacy Policy.
- 6.2.3. Take precautions to protect the confidentiality of the User's personal data in accordance with the procedure usually used to protect this kind of information in existing business practice.
- 6.2.4. Block personal data relating to the relevant User from the moment of an appeal or request by the User or their legal representative or the authorized body for the protection of the rights of personal data subjects, for the period of verification, in case of identification of inaccurate personal data or illegal actions.

#### 7. RESPONSIBILITIES OF THE PARTIES

- 7.1. The Website Administration, if failed to fulfill their obligations, is liable for losses incurred by the User in connection with the unlawful use of personal data, in accordance with the legislation of the Russian Federation, with the exception of cases provided for in clause 5.2 and 7.2 of this Privacy Policy.
- 7.2. In case of loss or disclosure of confidential information, the Website Administration is not responsible if this confidential information:
- 7.2.1. Became public before its loss or disclosure.
- 7.2.2. Was received from a third party until it was received by the Website Administration.
- 7.2.3. Was disclosed with the consent of the User.

### 8. DISPUTES RESOLUTION

- 8.1. Before going to court with a claim on disputes arising from the relationship between the User and the Website Administration, it is mandatory to submit a claim (a written proposal for a voluntary settlement of the dispute).
- 8.2. The recipient of the claim, within 30 calendar days from the date of receipt of the claim, notifies the claimant in writing of the results of the consideration of the claim.
- 8.3. If an agreement is not reached, the dispute will be referred to the judicial authority in accordance with the current legislation of the Russian Federation.
- 8.4. The current legislation of the Russian Federation applies to this Privacy Policy and the relationship between the User and the Website Administration.

### 9. ADDITIONAL TERMS

- 9.1. The Website Administration has the right to make changes to this Privacy Policy without the consent of the User.
- 9.2. The new Privacy Policy comes into force from the moment it appears on the Website, unless otherwise provided by the new edition of the Privacy Policy.
- 9.3. Please, send all suggestions or questions regarding this Privacy Policy to the email: welcome@villaelenahotel.ru
- 9.4. The current Privacy Policy is published here: https://villaelenahotel.ru/