

## **Privacy policy**

### **Privacy policy of personal information and use of cookies in relation to the site and applications of the “Vvedenskii” Hotel**

CJSC “Hotel Vvedenskii” (hereinafter - “the Hotel”), which owns and manages the website <https://vedenskyhotel.ru>, carefully monitors the observance of the rights of users. We attach great importance to the confidentiality of personal information of every user/visitor of the Website (hereinafter-the User.) The privacy policy of personal information and the use of cookies in connection with the web-site and applications of the “Vvedenskii” Hotel (hereinafter referred to as the “Privacy Policy”) applies to all information that the Hotel can receive about the User while using the <https://vedenskyhotel.ru> website and applications (collectively, referred to as our “Website”), and in the course of further execution by the Hotel of agreements and contracts with the User (hereinafter referred to as the “Services”).

Please note that the provision of detailed information remains at your discretion: in most cases, you can independently determine what information you would like to provide. Obligatory data is required so that we could provide the services you requested. You can definitely remain anonymous or use a pseudonym.

We do not collect personal data of children without the consent of their parents or guardians. Please contact us if you become aware of the transfer of such information without the consent of a parent or guardians. Upon receipt of appropriate instructions from parents or guardians, we will immediately remove the data.

#### **Agreement to the processing of personal information, including personal data.**

Use of the Website (the User’s request to any of the web pages included in the Website), including the indication of the User’s personal data in the fields of the reservation and payment form, in comments and applications, is an expression of unconditional acceptance by the User of all points of the Privacy Policy and confirmation of unconditional consent (acceptance) by you (the User) of this Privacy Policy and the terms of processing personal information specified therein in full, including using the Website <https://vedenskyhotel.ru>, leaving your data by filling out the form fields, and also using any of our services you:

-join this Privacy Policy;

-confirm that all your data belongs to you personally;

-confirm and acknowledge that you have carefully read the full Privacy Policy and terms and conditions of the processing of your personal information, including your data in form fields, as well as you understand the text of the Privacy Policy and terms and conditions of processing of personal information;

-give consent to the processing of personal information provided with the data;

-agree with the terms and conditions of the processing of personal information, including personal data.

#### **This consent is accepted for processing the following personal data:**

surname, name, patronymic;

date and place of birth;

citizenship;

Passport data;

place of registration and residence (country, city, region, address);

phone numbers;

e-mail addresses;

place of work;

cookies;

information about your IP address;

information about your location;

information about the source of the transition to the Website.

**Under this agreement, you grant to the Hotel the right to perform the following actions (operations) with personal data:**

collecting and acquisition;

storing during the period established by regulatory documents for keeping records, but not less than three years from the date of termination of the use of services;

specification (updating, changing);

use;

removing;

depersonalization;

transfer at the request of the court (including to third parties, subject to measures to ensure the protection of personal data from unauthorized access).

The collection, storage and processing of personal data that we request from the User while using the Website are required so that we can provide you with qualitative services described on the Website.

In order to provide accommodation services, the User's data is used for an unambiguous single identification of the User's booking, its execution and payments thereon. In addition to the confirmation of booking, the User may receive all changes to bookings or the User's data.

At any time these actions on the part of the Hotel may be suspended on the basis of a written application from the User about the termination of the processing of personal data from the date of receipt of the application by the Hotel.

If you do not agree to be bound by this Privacy Policy, you should not access the Website or use the Services of the Website.

**Links to other websites.**

The following Privacy Policy applies to data that is collected solely on our Website. However, it may include links to external resources that we do not administer and control. The Privacy Policy practiced by

other websites is not within our sphere of influence. As soon as you make the transition to other resources, you need to find information on their privacy policy before entering your data there.

In particular, if the User visits the Website page that contains the social network plug-in, the Internet browser / the User's program will automatically contact the social network server. Thus, the social network will receive information that the User's browser has requested the corresponding page on our Website, even if the User does not have a profile in the corresponding social network or he did not actually interact with the plug-in, for example, he did not click the "Like" button.

If you are a social network user and have logged into your account, the social network can automatically remember your credentials. If you use plug-ins, for example, click the "Like" button, the relevant information is sent directly to the social network and stored there. The same way the plug-ins Publish, Share and Tell Your Friends on some of our websites in social networks work. We can not influence the nature and amount of information that will be transferred to the social network, as well as its subsequent use.

If you do not want the social network to compare the data collected through our Website directly with your profile on the social network, you should leave your account on the social network before visiting our website.

### **Users' personal information processed by the Hotel**

#### **Within the framework of this Policy, "The User's personal information" is defined as:**

-Personal data that the User provide about himself (herself) when filling out forms of booking and/or payment, and/or contact information, in comments, messages and applications at <https://vedenskyhotel.ru/contact-us/>, or sending such information in a letter to the email specified in the section <https://vedenskyhotel.ru/contact-us/>, or via phone/fax, and/or submitting guest registration card on paper on arrival at the Hotel, as well as in the other use of the Website and other Web resources, including personal data of the User. The information required for the provision of the Services is marked in a special way - "Required field". Other information is provided by the User at his/her discretion.

-Data that is automatically transferred to the Website during its use with the software installed on the User's device, including the IP address, cookie data, information about the User's browser (or other program that accesses the Website), technical specifications of the equipment and software used by the User, the date and time of access to the Website, the addresses of the requested pages and other similar statistical information.

The Hotel does not verify the validity of personal information provided by the User, and does not have the ability to evaluate the User's capacity. However, the Hotel assumes that the User provides reliable and sufficient personal information and maintains this information up to date.

The Hotel collects and stores only the personal information necessary to provide the services to the User, except when the law provides for compulsory storage of personal information during the period specified by law. When processing personal data of the Users, the Hotel is governed by the norms of the Federal Law of the Russian Federation "On Personal Data" No. 152-Φ3 and other applicable legislation.

#### **The right to receive, change, delete / impersonate information**

In accordance with the current legislation, the User is entitled to receive information about personal data, and, if necessary, the right to adjust, block or delete this data.

To get access to information, ask questions about our privacy protection rules, to change your preferences for receiving promotional materials or make a complaint, please contact us using the feedback form <https://vedenskyhotel.ru/contact-us/>

At any time the User can change (update, complement) the personal information, provided by the User, or part of it using the feedback form <https://vedenskyhotel.ru/contact-us/>.

The User can also request the removal / depersonalisation of the personal information, provided by the User, using the feedback form <https://vedenskyhotel.ru/contact-us/>, In this case, the removal of the User's personal information by the Hotel may result in the inability of the Hotel to provide certain Services.

The rights, changes and removals / depersonalisation of the provided personal information provided for in this Privacy Policy may be restricted in accordance with the requirements of the legislation of the Russian Federation. In particular, such restrictions may include the obligation of the Hotel to save information edited or deleted by the User for a term established by the legislation, and to transfer such information in accordance with the legally established procedure of public authority.

## **Confidentiality of personal information**

### **Collection of personal data**

Our Website collects and registers personal data provided by you. This occurs when filling in a form to book hotel rooms, reserve seats in the restaurant, to apply for the rent of conference hall, as well as upon leaving personal reviews under the appropriate heading. Personal data includes any information that is required to identify a person, both physical and legal. This may be the first and last name, company name, email address, mobile phone number, credit card information.

### **Use of personal data**

#### **The Hotel processes the User's personal data for the following purposes:**

- identification of the User within the Website, agreements and contracts with the Hotel;
- providing the User with a personalized Services and execution of agreements and contracts;
- communication with the User, including notifications, requests and information relating to the Hotel Services, execution of agreements and contracts, as well as handling of inquiries and applications from the User;
- carrying out statistical, analytical and other research based on impersonal data;
- repayment of money to the User.

In particular, the personal data we receive from the Website Users is necessary for us to register the Users and provide them with services at the Vvedenskii Hotel, including in the conference halls, cafes and restaurants of the hotel. Thanks to this data, rooms can be booked, tables can be reserved, requests for reservation of the conference hall can be fulfilled. In addition, this data is needed for the normal operation of the Website, to improve its functioning and for the execution of tasks, for which the permission has been received from the Users. Personal data is also used to provide feedback to the Users. For example, if a user accesses us through the Website, we reserve the right to respond to him / her using the data that he / she entered into the forms intended for this field. We also use personal data to inform our users that this Privacy Policy has been significantly modified.

Your personal information may be used for advertising and marketing research exclusively in the extent to which you have agreed. We can use the data for this purpose only if you express your explicit consent to this, for example, put a tick in the appropriate line of the questionnaire during the promotion and then confirmed your decision.

If you give a clear consent to the use of your personal data for advertising or marketing purposes, it will be kept and permanently used for this purpose, for example, for mailings, requests for your participation in contests or lotteries by e-mail, mail or other communication channel, the use of which you give your consent.

We may also use your data to create and maintain a user profile to provide you with personalised advertisements and promotions. We may also use the data to improve the services on our Website, to analyze advertising and marketing activities for the research and evaluation of sales.

### **Disclosure of personal information.**

With respect to the User's personal information, its confidentiality remains, except for cases of voluntary provision by the User of information about the User for general access to an unlimited number of persons, including through the Website.

The hotel has the right to transfer the personal information of the User to third parties in the following cases:

- the User agreed to such action;
- the transfer is necessary for the use by the User of the Website or for the execution of the Hotel Services and/or a specific, individual user agreement or contract;
- the transfer is provided for by Russian or other applicable legislation within the framework of the procedure established by law;
- to ensure protection of the rights and legitimate interests of the Hotel or third parties in cases when the User violates any documents containing the conditions for providing services to the Users by the Hotel;
- as a result of the processing of the User's personal information through depersonalization, anonymized statistical data has been obtained, and it is transferred to a third party for research, performance of work or the provision of services on behalf of the Hotel.

The Hotel has the right to transfer the User's personal data to third parties solely for the purpose of executing contracts and agreements for the provision of Services to which the User is or will be a party. Consent to the transfer of information, including personal information, to third parties specified by the User is given at the time of acceptance of this Privacy Policy.

Personal data may also be disclosed in situations provided for by law, or in the event that the administration of the Website determines that this is necessary for the proper passage of legal procedures, for participation in litigation, for execution of a judgment, for any legal procedures that are required for interaction between the administration of the Website and the User. In any other cases, the personal data may not be disclosed or transferred to third parties. It should be remembered that the data that you enter into the review text will be available to other users of the Website; they can be viewed by all visitors of the rubric.

The Hotel provides necessary and sufficient legal, organizational and technical measures to protect The Users' information from unauthorized or accidental access, destruction, modification, blocking, copying, distribution, as well as from other misconduct of third parties with it.

### **Policy regarding non-personal information**

#### **Non-personal information**

We also collect non-personal data, which includes information about your activity on the Website. Our Website may use “Cookies” or “Other Technologies” (for example, “point markers”, “web beacons”, “transparent GIFs”, links in e-mail messages, JavaScript, device identification numbers assigned to Google or Apple, or other similar technologies). Cookies and Other Technologies allow us and third-party companies to receive information about your visits to the Website, including to analyze the trends of your visits. We use this information to process your bookings or inquiries, as well as to provide interactive and mobile advertisements, messages and content in accordance with your interests.

At the same time, we can automatically collect data from our side (that is, not at registration), which is not personal (for example, the type of web browser and operating system used, the domain name of the website from which access is made, the number of visits, the average time spent on our website, viewed web pages). So, we register the pages you visited, the links by which you switched, we collect other data about how you used our website. We also receive and store the usual information that your browser sends to us. This is your IP address, your browser name, the language you are using, the amount of time you spend on our pages, and their addresses. In order for our website to operate in the optimal mode, we need to constantly conduct an analysis for which such data is needed. We may also use this data to analyze the attractiveness of our Website, enhance its efficiency or improve the content.

For web analytics, we need information that transmit cookies. You can read the privacy policies of the popular Web analytics services:

[Google Analytics \(Privacy Policy\)](#)

[Yandex.Metrics \(Privacy Policy\)](#)

## **Cookies**

Cookies are small text files that are stored on your computer or a mobile device (“Device”) when you visit a website. Cookies alone can not be used to identify your identity, although in some cases we may combine website cookies or third-party cookies with personal information that you provided to us or information about you that we received from other sources.

You can prevent your browser to receive such files or configure it to ask permission before sending them to you. A number of websites, their services or functions cannot be performed correctly without these files. Remember that the data generated by cookies cannot identify an individual user. They do not transmit viruses to infect your computer, they are not able to run third-party programs.

### **The use of cookies**

Our website uses cookies, in particular to collect non-personal information and control the User’s interaction with the Website. Thanks to these files, we register your preferences and your settings.

The collected aggregate information allows us to analyze the traffic patterns on our Website and improve the convenience of navigation for the Website visitors. For example, we may use cookies to:

- save a user name and password, when filling out forms, for determining the geographical location of the User for future visits in order to simplify and speed up the logon;
- save linguistic and other preferences of the User;
- confirm that the User receives all the necessary information;
- ensure safe and reliable online transactions;

-track the User's reaction to advertising and the content of the website or application to analyze and determine the frequency of sending you the same advertisement;

-determine the number of visitors to the Website, and the way visitors use the Website so that we can support its quick and efficient operation, as well as help in providing information and content that fits your interests and location;

-offer useful links based on the last viewed pages, to collect statistics about navigation (google analytics), which allows us to improve our online services, and for the exchange of information in social networks

Returning to our website again and again, you will be able to use it fully, without entering the same information every time. You save time by completely safe technology, without risking the loss of your personal data. Through these files we receive from you only non-personal information that we need for statistical analysis and improving the work of the Website.

Most browsers process cookies automatically, but a user can change the settings to disable this feature. You can block all cookies or process only certain cookies and disable other types. Sections such as "Options" or "Preferences" or other similar sections of the browser menu allow the user to use cookies and other tracking technologies, provide explanations for receiving browser notifications about activation of such technologies. The user can also refer to the "Help" section, which is available in most browsers. Or you can find simple and clear instructions on how to manage cookies for different types of Web browsers on the website [www.allaboutcookies.org](http://www.allaboutcookies.org), and [www.adobe.com/devnet/security.html](http://www.adobe.com/devnet/security.html) or similar in the Internet.

Remember that rejection of cookies may affect your ability to perform certain transactions on the Website, and our ability to recognize your browser when you visit the Website.

**The various types of cookies that can be used on the Website are described below.**

The main cookies. The main cookies are necessary for the operation of the Website and allow you to use its services and features. Disabling these cookies may make the services and functions available.

Functional cookies. We use Functional cookies to store your preferences on the Website, such as your language preferences or travel information, which you have previously used when booking our hotel. Some Functional cookies are required to view maps or videos on our Website. We also use "Flash cookies" for a particular animated content.

Sessional cookies. This type of cookie is stored only temporarily during a browsing session, and will be removed from the device when the browser is closed. We use Sessional cookies to support the functionality of the Website and get an idea of your trends in using the Website, that is, what pages you visit, which links you use and how much time you spend on each page.

Permanent cookies: Cookies of this type are not deleted when the browser is closed, but stored on the device for a fixed period of time or until you delete them. Each time you visit the Website, the server where the cookie is installed, will recognize the permanent cookies that are stored on your device. We and other persons use permanent cookies to preserve your preferences in order to ensure their availability at your next visit and to keep a more accurate record of the frequency of your visit to the Website, the frequency of returns, possible changes in the use of the Website over time, and the effectiveness of advertising.

Advertising cookies allow us to show you the most relevant offers and advertising on the Website and third party Websites, or by e-mail or other messages. For example, some Advertising cookies help our service providers and other advertisers select advertisements based on your interests, including interests expressed or implied when visiting websites, using online services and applications. Other Advertising cookies help

prevent the re-emergence of the same advertisement. These types of cookies also help us to provide you with the materials of the Website according to your interests and needs.

As noted below, some Analytical cookies and Other Technologies are used in part to promote advertising.

Advertising cookies also include cookies of social networks. Social networking cookies are used to share the content of the Website with people who are or are not members of social networks, such as Facebook, Twitter, YouTube and Vkontakte (“ВКонтакте”). These cookies are typically configured by provider of social networks and provide smooth and uninterrupted exchange of data.

Analytical cookies collect information about your use of the Website and allow us to improve its work. These cookies provide us with summary information that we use to track website performance, count page visits, identify technical errors, track visitors’ access to the Website, and measure the effectiveness of advertising (including emails sent to you).

Other Technologies may be used for the same purposes, as a cookie, which allows us and third parties to know when you visit the Website and understand how you interact with the emails or advertising messages. Using Other Technologies, we get general information (your operating system, the version of your browser, the URL of the website you came from), or aggregate information to improve the website for the convenience of users and to learn traffic patterns.

### **The Required cookies**

Some cookies are required because the Website may not work properly without them. These required cookies can not be disabled. Therefore, the Hotel is not responsible for the failure to provide the service, to ensure the correct operation of which you must use cookies in the event that the reception and receipt of cookies will not be allowed by the User.

Cookies <https://vedenskyhotel.ru>

Our cookies contain the following data: a random ID, website settings, selected by users, a short history of Web browsing on the websites of <https://vedenskyhotel.ru>, which has a retention period of \_ days.

Cookies from other Websites

We store several of our cookies, but when services from other websites are used, they can also send cookies to analyze their content. The services that we use and that retain their cookies are listed below. As this list may change over time as a result of the development of these services, we cannot guarantee that it will always contain all the cookies that you can obtain from third party websites.

### **Google Analytics**

We use Google Analytics to collect and analyze data about how visitors use our websites. This information includes your IP address, which is transmitted to Google's servers and stored there.

Google creates reports about the operation of the website and provides other services related to the use of the Internet. Google may also transfer this information to third parties if it is required by law, or when those parties process the information on Google’s behalf. Google will not associate your IP address with other information stored by Google. By browsing this website, you agree that Google will process data about viewing Web pages as described above. You can still prevent this by disabling cookies in your browser. For more information see: <http://www.google.com/intl/en/policies/technologies/cookies/>

### **Facebook**



We use social networking plug-ins to share the content of the website on Facebook. If you have visited the Facebook website, some previously stored cookies will be available to it. Otherwise, other cookies will not be added. Facebook support page dedicated to cookies is available at:

<https://www.facebook.com/help/360595310676682/>

### **Twitter**

We use the plugins of the social network Twitter to share the content of the website on Twitter. Twitter uses cookies to improve our services. For more information about Twitter's privacy policy, please visit:

<https://twitter.com/privacy>

### **Instagram**

### **Youtube**

### **Vkontakte (“ВКонтакте”)**

### **Aggregated information.**

For carrying out various statistical research and analysis, we can use the personal data provided by you, combined with the data of other users. The aggregated information obtained this way does not allow to identify specific users. It is necessary to undertake analyses of specific groups of users, trends of their interaction with the Website. This aggregated information is not linked to specific persons, they cannot be identified, you cannot establish contact with them. Such anonymous aggregated information may be shared with third companies that perform work for us, such as performing statistical analysis. Your personal data is safe.

### **Changes to this Privacy statement.**

Our company reserves the right to periodically make changes or add additional items to this Privacy Policy. Changes may concern all sections or just parts of them, so we warn users to regularly read this document. This will allow us to be fully aware of exactly how we protect your private data that you provide to us when ordering our services and using the Website.

Our page contains the most recent version of this Privacy Policy, you can view it by clicking the Privacy Policy link located at the bottom of the home page. When deciding on changes to the provisions, we always indicate the date of the recent changes at the very beginning of the text; we usually do not send other notifications to users. However, if the changes are really significant, we place an announcement on the home page. The new revision of the Policy shall take effect from the date of its posting, unless otherwise provided by the new version of the Policy. If you continue to use our website, it means you accept the changes and agree with them.

### **Communication with the Hotel.**

If you want to clarify anything, ask us questions or make suggestions about the Privacy Policy, then you can send your letter to the following e-mail address [info@vedenskyhotel.ru](mailto:info@vedenskyhotel.ru)