

Personal Data Processing Policy

1. General Provisions

This personal data processing policy has been compiled in accordance with the requirements of Federal Law No. 152-FZ of July 27, 2006, "On Personal Data" (hereinafter referred to as the Personal Data Law) and defines the procedure for processing personal data and measures to ensure the security of personal data taken by Elena Vladimirovna Vasilyeva, an individual entrepreneur (hereinafter referred to as the Operator).

1.1. The Operator's primary goal and condition for carrying out its activities is to respect the rights and freedoms of individuals and citizens when processing their personal data, including the protection of their rights to privacy, personal and family secrets.

1.2. This Operator policy on personal data processing (hereinafter referred to as the Policy) applies to all information the Operator may receive about visitors to the website <https://enigma-hotel.ru/>

2. Key Concepts Used in the Policy

2.1. Automated processing of personal data — the processing of personal data using computer technology.

2.2. Blocking of personal data means temporarily suspending the processing of personal data (except in cases where processing is necessary to clarify the personal data).

2.3. Website means a collection of graphic and informational materials, as well as computer programs and databases, making them available online at the network address <https://enigma-hotel.ru/>

2.4. Personal data information system means a collection of personal data contained in databases and the information technologies and technical means that enable their processing.

2.5. Anonymization of personal data means actions that make it impossible to determine the attribution of personal data to a specific User or other personal data subject without the use of additional information.

2.6. Personal data processing — any action (operation) or set of actions (operations) performed with or without automated means with personal data, including collection, recording, systematization, accumulation, storage, clarification (updating, modification), retrieval, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, or destruction of personal data.

2.7. Operator — a government agency, municipal body, legal entity, or individual that, independently or jointly with other persons, organizes and/or carries out the processing of personal data, and determines the purposes of personal data processing, the composition of personal data to be processed, and the actions (operations) performed with personal data.

2.8. Personal data — any information relating directly or indirectly to an identified or identifiable User of the website <https://enigma-hotel.ru/>

2.9. Personal data permitted for distribution by the personal data subject are personal data to which the general public has been granted access by the personal data subject through consent to the

processing of the personal data, permitted for distribution by the personal data subject in accordance with the procedure established by the Personal Data Law (hereinafter referred to as personal data permitted for distribution).

2.10. User — any visitor to the website <https://enigma-hotel.ru/>

2.11. Provision of personal data — actions aimed at disclosing personal data to a specific person or a specific group of persons.

2.12. Dissemination of personal data — any actions aimed at disclosing personal data to an indefinite number of persons (transfer of personal data) or making the general public familiar with personal data, including disclosing personal data in the media, posting it on information and telecommunications networks, or providing access to personal data by any other means.

2.13. Cross-border transfer of personal data — the transfer of personal data to a foreign government agency, foreign individual, or foreign legal entity.

2.14. Destruction of personal data — any actions resulting in the irreversible destruction of personal data, making it impossible to restore the contents of the personal data in the personal data information system, and/or the destruction of tangible media containing the personal data.

3. Basic Rights and Obligations of the Operator

3.1. The Operator has the right to:

— receive reliable information and/or documents containing personal data from the personal data subject;

— if the personal data subject revokes consent to the processing of personal data, or requests termination of the processing of personal data, the Operator has the right to continue processing the personal data without the consent of the personal data subject, provided there are grounds for doing so, or specified in the Personal Data Law;

— independently determine the composition and list of measures necessary and sufficient to ensure the fulfillment of the obligations stipulated by the Personal Data Law and regulatory legal acts adopted in accordance with it, unless otherwise provided by the Personal Data Law or other federal laws.

3.2. The Operator is obligated to:

— provide the personal data subject, upon request, with information regarding the processing of their personal data;

— organize the processing of personal data in accordance with the procedure established by the current legislation of the Russian Federation;

— respond to inquiries and requests from personal data subjects and their legal representatives in accordance with the requirements of the Personal Data Law;

— notify the authorized body for the protection of the rights of personal data subjects, upon request of such body, of the necessary information within 10 days of the date of receipt of such request;

— publish or otherwise ensure unrestricted access to this Policy regarding the processing of personal data;

- take legal, organizational, and technical measures to protect personal data from unauthorized or accidental access, destruction, modification, blocking, copying, provision, distribution, and other illegal actions in relation to personal data;
- cease the transfer (distribution, provision, access) of personal data, cease processing, and destroy personal data in the manner and cases stipulated by the Personal Data Law;
- fulfill other obligations stipulated by the Personal Data Law.

4. Basic Rights and Obligations of Personal Data Subjects

4.1. Personal data subjects have the right:

- to receive information regarding the processing of their personal data, except in cases stipulated by federal laws. Information is provided to the personal data subject by the Operator in an accessible form and must not contain personal data related to other personal data subjects, except in cases where there are legal grounds for disclosure of such personal data. The list of information and the procedure for obtaining it are established by the Personal Data Law;
- request that the Operator clarify their personal data, block it, or destroy it if such personal data is incomplete, outdated, inaccurate, illegally obtained, or not necessary for the stated purpose of processing, and take measures provided by law to protect their rights;
- require prior consent when processing personal data for the purpose of promoting goods, works, and services;
- revoke consent to the processing of personal data, as well as request that the processing of personal data cease;
- appeal to the authorized body for the protection of the rights of personal data subjects or in court against the Operator's unlawful actions or inaction in the processing of their personal data;
- exercise other rights provided for by Russian law.

4.2. Personal data subjects are obligated to:

- provide the Operator with accurate information about themselves;
- notify the Operator of any clarifications (updates, changes) to their personal data.

4.3. Persons who provide the Operator with false information about themselves or about another personal data subject without their consent are liable in accordance with Russian legislation.

5. Principles of Personal Data Processing

5.1. Personal data is processed lawfully and fairly.

5.2. Personal data processing is limited to achieving specific, predetermined, and legitimate purposes. Processing of personal data incompatible with the purposes for which it was collected is not permitted.

5.3. Combining databases containing personal data processed for incompatible purposes is not permitted.

5.4. Only personal data that is relevant to the purposes for which it is processed is subject to processing.

5.5. The content and volume of personal data processed correspond to the stated purposes of processing. Excessive processing of personal data in relation to the stated purposes of processing is not permitted.

5.6. When processing personal data, the accuracy, sufficiency, and, where necessary, relevance to the purposes of processing are ensured. The operator takes and/or ensures that necessary measures are taken to delete or rectify incomplete or inaccurate data.

5.7. Personal data is stored in a form that allows the identification of the personal data subject, for no longer than required for the purposes of processing the personal data, unless the storage period for personal data is established by federal law or an agreement to which the personal data subject is a party, beneficiary, or guarantor. Processed personal data They are destroyed or anonymized upon achieving the processing purposes or when the need to achieve these purposes is no longer necessary, unless otherwise provided by federal law.

6. Purposes of Personal Data Processing

Purpose of Processing: Informing the User by sending emails Personal Data

- * Last name, first name, patronymic
- * Email address
- * Telephone numbers
- * Year, month, date, and place of birth

Legal Basis

- * Agreements concluded between the operator and the personal data subject

Types of Personal Data Processing

- * Collection, recording, systematization, accumulation, storage, destruction, and anonymization of personal data
- * Sending informational emails

7. Terms of Personal Data Processing

7.1. Personal data is processed with the consent of the personal data subject to the processing of their personal data.

7.2. The processing of personal data is necessary to achieve the purposes stipulated by an international treaty of the Russian Federation or by law, for the performance of the functions, powers, and duties imposed on the operator by the legislation of the Russian Federation.

7.3. The processing of personal data is necessary for the administration of justice, the execution of a judicial act, or the execution of an act of another body or official subject to enforcement in accordance with the legislation of the Russian Federation on enforcement proceedings.

7.4. The processing of personal data is necessary for the performance of an agreement to which the personal data subject is a party, beneficiary, or guarantor, as well as for the conclusion of an agreement initiated by the personal data subject or an agreement under which the personal data subject will be a beneficiary or guarantor.

7.5. The processing of personal data is necessary to exercise the rights and legitimate interests of the operator or third parties, or to achieve socially significant goals, provided that the rights and freedoms of the personal data subject are not violated.

7.6. The processing of personal data is performed if access to it is granted to an unlimited number of persons by the personal data subject or at their request (hereinafter referred to as publicly available personal data).

7.7. The processing of personal data is performed only if it is subject to publication or mandatory disclosure in accordance with federal law.

8. Procedure for the Collection, Storage, Transfer, and Other Processing of Personal Data.

The security of personal data processed by the Operator is ensured by implementing legal, organizational, and technical measures necessary to fully comply with the requirements of current legislation on personal data protection.

8.1. The Operator ensures the security of personal data and takes all possible measures to prevent unauthorized persons from accessing it.

8.2. The User's personal data will never, under any circumstances, be transferred to third parties, except in cases related to compliance with current legislation or if the personal data subject has consented to the Operator's transfer of data to a third party for the fulfillment of obligations under a civil law contract.

8.3. If inaccuracies are discovered in personal data, the User may update it independently by sending a notification to the Operator's email address enigma-hotel@yandex.ru with the subject line "Updating personal data."

8.4. The processing period for personal data is determined by the achievement of the purposes for which the personal data was collected, unless a different period is provided by the agreement or applicable law.

The User may revoke their consent to the processing of personal data at any time by sending a notification to the Operator via email to enigma-hotel@yandex.ru with the subject "Revocation of consent to the processing of personal data."

8.5. All information collected by third-party services, including payment systems, communication tools, and other service providers, is stored and processed by the specified parties (Operators) in accordance with their User Agreement and Privacy Policy. The subject of the personal data and/or the specified documents. The Operator is not responsible for the actions of third parties, including the service providers specified in this clause.

8.6. Prohibitions established by the personal data subject on the transfer (except for granting access), as well as on the processing or processing conditions (except for obtaining access) of personal data permitted for distribution, do not apply in cases where personal data is processed in state, public, or other public interests defined by Russian legislation.

8.7. The operator ensures the confidentiality of personal data when processing personal data.

8.8. The operator stores personal data in a form that allows identification of the personal data subject for no longer than this. The purposes of personal data processing require it, unless the retention period for personal data is established by federal law or an agreement to which the personal data subject is a party, beneficiary, or guarantor.

8.9. The termination of personal data processing may be the achievement of the personal data processing purposes, the expiration of the personal data subject's consent, the revocation of consent by the personal data subject, or a request to cease processing, as well as the detection of unlawful processing of personal data.

9. List of actions performed by the Operator with received personal data

9.1. The Operator collects, records, systematizes, accumulates, stores, clarifies (updates, changes), retrieves, uses, transfers (disseminates, provides, accesses), depersonalizes, blocks, deletes, and destroys personal data.

9.2. The Operator carries out automated processing of personal data with or without the receipt and/or transmission of the received information via information and telecommunications networks.

10. Cross-Border Transfer of Personal Data

10.1. Prior to commencing any cross-border transfer of personal data, the Operator is obligated to notify the authorized body for the protection of personal data subjects' rights of its intention to carry out such cross-border transfer (such notification is sent separately from the notification of intent to process personal data).

10.2. Prior to submitting the above notification, the Operator is obligated to obtain the relevant information from the authorities of the foreign state, foreign individuals, and foreign legal entities to whom the cross-border transfer of personal data is planned.

11. Confidentiality of Personal Data

The Operator and other persons who have gained access to personal data are obligated not to disclose to third parties or distribute personal data without the consent of the personal data subject, unless otherwise provided by federal law.

12. Final Provisions

12.1. The User may obtain any clarification on any questions regarding the processing of their personal data by contacting the Operator via email at enigma-hotel@yandex.ru.

12.2. This document will reflect any changes to the Operator's personal data processing policy. This policy is valid indefinitely until replaced by a new version.

12.3. The current version of the Policy is publicly available online at <https://enigma-hotel.ru/upload/iblock/877/37y2bsyayus06jd59p23oc61g0xsa9he.pdf>