



Personal Data Processing Policy at the Stella di Mosca Hotel

This Personal Data Processing Policy (hereinafter referred to as the Policy) describes how VIS-INVEST Limited Liability Company (VIS-INVEST LLC, 1027700289759, TIN 7709033070) processes the personal data of website visitors at stelladimoscahotel.com (hereinafter referred to as the website).

Please read this Policy to understand the purposes for which we process your personal data and how you can exercise your rights in relation to personal data.

To contact us regarding personal data processing, you can use the following information:

- 125009, Moscow, 9 Bolshaya Nikitskaya St. (Stella di Mosca Hotel), city phone number +74952525555, e-mail address: hotel@stelladimosca.ru

Terminology

Personal Data is any information that directly or indirectly relates to you or allows you to be identified.

Personal Data Operator is a legal entity or individual that processes personal data.

When you visit our website stelladimoscahotel.com, VIS-INVEST LLC processes your personal data, and, therefore, is the operator of your personal data.

Personal Data Processing is the performance of any actions with personal data.

Your Basic Rights When Processing Personal Data

In accordance with Federal Law No. 152-Φ3 On Personal Data dated July 27, 2006 (hereinafter, 152-Φ3), you have the right to:

- access personal data;
- clarify personal data;
- block and delete personal data;
- appeal against our actions or our inaction;



- appeal against decisions taken solely on the basis of automated processing of personal data;
- withdraw consent to personal data processing.

How Can You Exercise Your Rights?

You (or your authorized representative) can send an official request to our address: 125009, Moscow, 9 Bolshaya Nikitskaya St., indicating in it information about the document proving your identity (type of document (passport), series and number, by whom and when issued), full name, information about the nature of our relationship with you, which will confirm the fact that we are processing your personal data, and the signature of the person sending the request.

The request can also be sent to us in the form of an electronic document by e-mail to hotel@stelladimosca.ru in which case the request must be signed with an electronic signature in accordance with the provisions of the Russian Federation legislation on electronic signature.

You can appeal against our actions as a personal data operator in territorial body of Roskomnadzor in your region.

Purposes, Terms, Grounds for Our Processing of Your Personal Data. List of Personal Data Processed.

Below you can find out why exactly, how and what data we process, where and to whom we transfer it, if required.

For the purposes listed below, we collect, record, systematize, accumulate, store, clarify (update, change), extract, use, transfer (provide, provide access to), block, delete and destroy your personal data.

The personal data we process does not belong to special categories or biometric data and is processed in an automated, non-automated or mixed manner.

Upon reaching the stated processing purposes, your personal data will be destroyed by deleting it from our information systems using the built-in tools of the information systems or by physically destroying the personal data carriers.



Processing of Requests Received at the Contact E-mail Addresses Indicated on Our Website stelladimoscahotel.com

By leaving a request for cooperation or simply contacting us using the e-mail address indicated on the website, you provide us with the following information: your e-mail address, as well as your first name (last name and patronymic, if provided). In addition, we will have access to any other information that you choose to provide to us in your e-mail.

The legal basis for processing the specified personal data is the initiative of the person to interact with the Operator in accordance with paragraph 5, Part 1, Article 6 of 152-Φ3, as well as the legitimate interest of the Operator in accordance with paragraph 7, Part 1, Article 6 of 152-Φ3.

We will destroy your personal data as soon as we stop interacting with you regarding your issue, depending on the nature of the request (data will be destroyed no later than 30 days after the request has been reviewed and a decision has been made on it in accordance with Part 4 of Article 21 of 152-Φ3). If, as a result of your request, we conclude an agreement with you, we will continue to process your personal data within the framework of our contract.

If you or your company contact us to conclude a contract, we will process the following personal data:

- last name, first name, patronymic (if provided);
- place of work (company name);
- position held (if the request is from a company);
- e-mail address;
- contact phone number.

In the event of a contract being concluded as a result of negotiations, we process all data provided by you about you and your employees/representatives on the basis of the concluded contract for the duration of its validity.

We will destroy data about you, your representatives and other data obtained in connection with the performance of the contract after 5 years from the termination of our contract. We are obliged to store information during this time, as required by Russian legislation:



- within 3 years after the termination of the contract for the purposes of judicial protection of the Operator's interests in accordance with Article 196 of the Civil Code of the Russian Federation;
- within 5 years after the termination of the contract for the purposes of accounting and tax accounting in accordance with Article 23 of the Tax Code of the Russian Federation, Article 29 of Federal Law On Accounting No. 402-Φ3.

***Processing of the Application for SPA Center Services Sent
Via the Feedback Form on the Website***

If you contact us via the feedback form on our website stelladimoscahotel.com to send us an Application for services and book the date and time of its provision, we will process your data to respond to you and confirm the possibility of fulfilling the Application you sent, clarify your wishes or offer available alternative options for fulfilling your Application.

To achieve this purpose, we will use your:

- name;
- contact phone number;
- other information that you deem necessary to provide in the Application, including a contact e-mail address, information about the desired date/time for the provision of the service.

The legal basis for processing the specified personal data is the initiative of the person to interact with the Operator in accordance with paragraph 5, Part 1, Article 6 of 152-Φ3, the consent of the person who submitted the application, as well as the legitimate interest of the Operator in accordance with paragraph 7, Part 1, Article 6 of 152-Φ3.

If, based on the results of the Application sent by us, you book a service at our SPA center, we will continue to process your personal data to fulfill your Application. If, following the review and discussion of the Application with you, the services are not booked, your data will be destroyed no later than 30 days after the Application has been reviewed and a decision has been made on it in accordance with Part 4 of Article 21 of 152-Φ3.



Processing of an Application for a Table Reservation in Our Restaurants, Sent Via the Booking Form on the Website

If you contact us with an application to book a table in one of our restaurants via the feedback forms at website stelladimoscahotel.com, by clicking on the SEND button, we will process your data to respond to you and confirm the possibility of booking for the date and time you specified and fulfill your application.

To achieve this purpose, we will use your:

- name;
- contact phone number;
- other information that you consider necessary to provide in the application, including last name, contact e-mail address, number of guests.

The legal basis for processing the specified personal data is the initiative of the person to interact with the Operator in accordance with paragraph 5, Part 1, Article 6 of 152-Φ3, as well as the legitimate interest of the Operator in accordance with paragraph 7, Part 1, Article 6 of 152-Φ3.

Your personal data will be destroyed no later than 30 days after your table reservation application has been fulfilled or cancelled (if you cancel your reservation).

Answering Calls to Phone Numbers Listed on the Website

You can call us, in which case we will get your phone number and ask for your name. The legal basis for processing the specified personal data is the initiative of the person to interact with the Operator in accordance with paragraph 5 of Part 1 of Article 6 of 152-Φ3, as well as our legitimate interest in improving the quality of services provided in accordance with paragraph 7 of Part 1 of Article 6 of 152-Φ3. We will destroy your personal data as soon as we stop communicating with you about your issue. If we enter into a contract with you, we will continue to process your personal data within the framework of our contract.



Reply to Messages from Messengers

You can contact us from the website via WhatsApp by clicking on the icon located in the upper left corner of the site pages, and then on the GO TO CHAT button at the top of the website pages or on the Contacts page.

In order to respond to your message, we will receive the following personal data from you: name/account/user name, phone number, other information that you consider necessary to provide to us in your message.

The legal basis for processing the specified personal data is the initiative of the person to interact with the Operator in accordance with paragraph 5 of Part 1 of Article 6 of 152-Φ3, as well as our legitimate interest in improving the quality of services provided in accordance with paragraph 7 of Part 1 of Article 6 of 152-Φ3. We will destroy your personal data as soon as we stop communicating with you about your issue. If we enter into a contract with you, we will continue to process your personal data within the framework of our contract.

Processing of Personal Data when Booking Hotel Services (Room) on the Website

You can book a room for accommodation and other hotel services at the STELLA di MOSCA hotel using the Booking Module on the website stelladimoscahotel.com. In this case, we receive the following data about you:

- last name, first name, patronymic (if provided);
- e-mail address;
- contact phone number;
- citizenship (if provided);
- check-in / check-out dates;
- payment information (for guaranteed reservation);
- other information that you consider necessary to provide to us by filling out the booking form.

The legal basis for processing the specified personal data is the initiative of the person to conclude a contract for the provision of hotel services in accordance with



paragraph 5 of Part 1 of Article 6 of 152-Φ3, as well as the legitimate interest of the Operator in accordance with paragraph 7 of Part 1 of Article 6 of 152-Φ3.

We will process the data received for the duration of the contract concluded on the basis of your booking application for the purpose of its performance. We will destroy data about you, your representatives and other data obtained in connection with the performance of the contract after 5 years from the termination of the contract / departure date. We are obliged to store information during this time, as required by Russian legislation:

- within 3 years after the termination of the contract for the purposes of judicial protection of the Operator's interests in accordance with Article 196 of the Civil Code of the Russian Federation;
- within 5 years after the termination of the contract for the purposes of accounting and tax accounting in accordance with Article 23 of the Tax Code of the Russian Federation, Article 29 of Federal Law On Accounting No. 402-Φ3.

The specified booking service (Booking Module) is provided by TRAVEL LINE SYSTEMS LLC (RF, 424003, Mari El Republic, Yoshkar-Ola, 56A Leninsky Prospekt). Accordingly, this person processes your personal data for the stated purpose on our behalf. Please read carefully the Privacy Policy and Online Booking Rules of TRAVEL LINE SYSTEMS LLC, available via the link during the booking process.

Subscription to Our Newsletter for News and Special Offers

We periodically prepare materials about special offers on our services, our news and events. To send these promotional and marketing messages, we use your:

- name;
- phone number;
- e-mail address.

Additionally, we can obtain data about the date of subscription to the mailing list, the fact and time of opening the message and the fact of clicking on the link in the message. We also receive information about whether your e-mail address/number is available to receive messages.



The basis for processing your personal data in this process is consent to the processing of personal data. You have the right to revoke your consent to the processing of personal data. To do this, simply write to us or unsubscribe from the mailing list using the instructions in the message you received.

We will delete your personal data once you unsubscribe from our newsletter or if we stop sending it before you unsubscribe.

Consideration of your Candidacy for Vacancies Published on the Website

To be considered for a vacant position in our hotel, a candidate can contact us using the feedback form on the Career page. To do this, you need to click on the tab with the appropriate vacancy and indicate your phone number in the proposed form. After this, you will receive a confirmation code via SMS, by entering which your CV on the hh.ru resource will become available to the employer.

When reviewing your CV, we process the following personal data about you as a candidate for a vacancy:

- first name, last name,
- contact phone number and/or e-mail address,
- information about education, qualifications and work experience, information about knowledge of foreign languages.

Additionally, we may receive other information that you choose to provide to us by filling out a form or in your CV.

The basis for processing your personal data in this process is consent to the processing of personal data.

The personal data processed for the specified purpose do not belong to special categories or biometric data and are processed both automatically and without the use of automation tools.

We will destroy the data provided by candidates within 3 months from the date of the decision to refuse employment or within 30 days from the date of receipt of the revocation of consent to the processing of personal data, depending on which occurs first. Upon reaching the stated purpose of processing, your personal data will be



destroyed by deleting it from the operator's information systems using the built-in tools of the information systems. If we decide to employ you, your personal data will be processed as employee data until the employment relationship is terminated.

Analytics of Visits to our Website

We would like you to find our website convenient to use, and we would like to be able to improve its operation taking into account your preferences and user experience. Therefore, to ensure that our website functions correctly, we use cookies that allow us to recognize you when you visit our website, remember your preferences and provide you with a personalized experience.

What are cookies? Cookies are small files, usually consisting of letters and numbers, that are downloaded to your device when you access certain websites. Cookies allow a website to recognize your device and display our website according to your preferences.

What cookies do we use:

- Strictly necessary cookies, without which our website would not function properly and which ensure its basic functions, such as page navigation, etc.
- Preference cookies, which help us remember your settings on our website so you do not have to change your settings the next time you visit
- Statistic cookies that help us understand how you interact with our website
- Marketing cookies, they help us show you products and offers that are most relevant to you, advertising that is relevant and attractive to the individual user



The cookies that are installed are stored by the browser and remain valid depending on their type. They can be stored either until the end of the session or until the User clears the browser, including indefinitely.

If you do not want us to collect your data using cookies, you can disable their collection in your browser settings. You can read more about this at the following links: Google Chrome, Yandex.Browser, Mozilla Firefox.

In addition to cookies, we use tracking technologies such as tags and scripts on our website to collect and store information about you. When you use our website, we have access to the following information about you: your IP address, location (country or city), type and version of your device's operating system, type and version of the browser on your device, type of the device and its display resolution, the source of your traffic, the language of your operating system and browser, as well as data about your actions on the Internet, the referring page. These technologies are used to analyze your behavior on the website and gather demographic information about our customer base as a whole to improve the quality and value of the services we provide. Our websites use cookies and retargeting pixels from analytics services such as Yandex.Metrica.

Personal data collected by the specified web analytics services are processed upon prior consent of the website user to process such personal data, provided by the website user by confirmation (by clicking the "OK" button in the pop-up window) when going to the website.

Data Security

Personal information we collect and store is considered confidential information. They are protected from loss, modification or unauthorized access during their processing, as required by Russian legislation. To achieve this, we use technical means and organizational measures. We strive to continually improve our systems and data protection practices.



Change of Policy

In the event of changes in our business processes, the emergence of new services or changes in legislation, we will update this Policy and make changes to it. The current version of the Policy is always published on our website.

Collection of Personal Data of Minors

Our website is not intended to process personal data of minors. If you have reason to believe that a child has provided us with personal data through our website, please notify us by e-mail at hotel@stelladimosca.ru