

Personal Data Processing Policy

In this document, Hotel Management Company LLC (also "we", "us", "our") describes the procedure for processing personal data of website users (*hereinafter referred to as the User*):

- carltonmoscow.com
- o2restaurant.com
- loyalty.o2restaurant.com

If you have any questions regarding the personal data processing, you can write to:

- our registered address: 3, Tverskaya Street, Moscow, 125009
- to our official email address: reservations@carltonmoscow.com. We attach great importance to the protection of your privacy and security of your personal data. Please read this Personal Data Processing Policy (*hereinafter referred to as the Policy*) carefully to understand for what purposes we process your personal data and how you can exercise your rights in relation to personal data.

Brief overview about personal data and your rights related to processing data processing

Personal data means any information that directly or indirectly relates to you or allows you to be identified.

Personal data processor means a legal entity or an individual who processes personal data. When you visit our website, we become the processor of your personal data.

Personal data processing means any actions with personal data.

In accordance with the Federal Law "On Personal Data", you have the right to:

- access to personal data;
- rectification of personal data;
- block and delete personal data;
- appeal against our actions or omissions;
- appeal against the decisions made solely on the basis of the automated processing of your personal data;
- revoke your consent to personal data processing.

How to exercise your rights?

- You may write an official request to our registered address, specifying the details of your identity document or the identity document of your representative (document type, series and number, issuing authority and date of issue), your full name or the full name of your representative, information about the nature of mutual relations confirming the fact of your personal data processing, your signature or the signature of your representative. This request can be sent to our email in the form of an electronic document signed in accordance with the legislative provisions of the Russian Federation concerning electronic signatures.

- You can also use our email address for your requests: reservations@carltonmoscow.com

You can appeal against our actions as the personal data processor to the [territorial authority of Federal Service for Supervision of Communications, Information Technology, and Mass Media \(Roskomnadzor\)](#) in your region.

Why do we process your personal data?

This section describes the purposes and terms of personal data processing and explains to whom we transfer your personal data. For these purposes, we will collect, record, systematize, accumulate, store, rectify (update, modify), extract, use, transfer (provide, provide access), block, delete, and destroy your personal data.

Processing of personal data on the website carltonmoscow.com

Processing of requests received to e-mail addresses: reservations@carltonmoscow.com, ccs@carltonmoscow.com, fo@carltonmoscow.com and others. To send emails with your questions and requests, you can use the email addresses posted on the website carltonmoscow.com.

If you contact us via the specified email addresses, we may need your data to process your letter, in particular:

- ✓ last name, first name, and patronymic;
- ✓ email address;
- ✓ contact phone number;
- ✓ text of the request.

In addition, other information provided by you in the email will be available to us.

After sending the request to the specified e-mail addresses, our employee will contact you via the e-mail address or other contact information provided by you.

Personal data processed for this purpose are not classified as special or biometric in accordance with Articles 10-11 of Federal Law No. 152-FZ and are processed in an automated manner.

The legal basis for processing of the above mentioned personal data is the Processor's legitimate interest, the agreement with the User, and the initiative of an individual to conclude the agreement in accordance with paragraphs 5 and 7 part 1 of Article 6 of Federal Law 152-FZ.

All data received when processing your letter sent to the e-mail addresses posted on the website will be stored and processed from 30 days to 3 years, depending on the type of request in accordance with Part 4 of Article 21 of Federal Law 152-FZ, Article 196 of the Civil Code of the Russian Federation (statute of limitations).

Upon expiry of the specified processing time, the User's personal data will be destroyed by deleting from information systems using the built-in features of the information system.

Processing of requests received through the web form at: carltonmoscow.com

You can also use the form on our website to send emails with your questions and requests at: carltonmoscow.com or send a request via telegram or WhatsApp messenger.

If you contact us, we may need your data to process your letter, in particular:

- ✓ name;
- ✓ phone number;
- ✓ text of the request.

In addition, other information provided by you in the email will be available to us.

After sending the request, our employee will contact you using the web form or by sending a reply message in the messenger.

Personal data processed for this purpose are not classified as special or biometric in accordance with Articles 10-11 of Federal Law No. 152-FZ and are processed in an automated manner.

The legal basis for processing of the above mentioned personal data is your consent to personal data processing in accordance with paragraph 1, part 1 of Article 6 of Federal Law FZ-152, provided by you by filling in the appropriate fields of the form on our website and clicking the "CONSENT" or similar button.

All data received when processing your request will be stored and processed from 30 days to 3 years, depending on the type of request in accordance with part 4 of Article 21 of Federal Law 152-FZ, and Article 196 of the Civil Code of the Russian Federation (statute of limitations).

Upon expiry of the specified processing time, the User's personal data will be destroyed by deleting from information systems using the built-in features of the information system.

Processing of personal data on the website o2restaurant.com

On the website o2restaurant.com the restaurant's table reservation module is presented. By filling out the Table Reservation form, the user agrees to the transfer of personal data: first name (last name and patronymic if provided), contact phone number, email address (if provided) Yandex LLC (16 Lva Tolstogo str., Moscow, 119021). For the purpose of booking confirmation at the O2 Restaurant, access to personal data will be provided by Hotel Management Company LLC (3 Tverskaya Street, Moscow, 125009).

The legal basis for processing the specified personal data is the user's consent to the processing of personal data in accordance with clause 1, Part 1, Article 6 FZ-152, provided by the user by filling in the appropriate fields of the form on the website and clicking the "Book" button.

All data received as part of a table reservation is stored and processed for 30 days to 3 years, depending on the type of request, in accordance with Part 4 of art. 21 152-FZ, art. 196 of the Civil Code of the Russian Federation (statute of limitations).

Upon reaching the specified processing time, the User's personal data is destroyed by deletion from information systems using the built-in information system tools.

On the website loyalty.o2restaurant.com the module of the O2 Restaurant guest loyalty system is presented. When registering in the loyalty system, we will ask you to provide the following information about you:

- ✓ first name (last name and patronymic if provided);
- ✓ contact phone number;
- ✓ email address;
- ✓ date of birth, without year of birth;
- ✓ financial transactions and purchase history

The personal data processed for this purpose does not belong to special categories or biometric in accordance with Articles 10-11 152-FZ and is processed in an automated manner. The legal basis for processing these personal data is the legitimate interest of the Operator in accordance with paragraphs 5, 7, part 1 of art. 6 152-FZ, as well as the initiative of a person to participate in the loyalty program of the O2 Restaurant, which is defined as the initiative of a person to interact with the Operator in accordance with paragraph 5, part 1 of art.6 152-FZ. The personal data provided by you will be processed within 30 days after processing the request in accordance with Part 4 of art. 21 152-FZ. The storage period of personal data of participants in the bonus program is no more than 5 years after the expiration of the agreement; after termination of obligations under the agreement; from the moment the personal data subject withdraws his consent to processing, equivalent to refusal to participate in the loyalty program – depending on which of the events occurs later). The PD processing method is mixed processing.

Answer to your call at the Processor's phone numbers posted on the website: carltonmoscow.com

If you have any questions regarding the use of the website carltonmoscow.com, you want to obtain more specific information about our services or ask other questions, then you may also contact us at our company's phone numbers posted on the website.

When contacting us by phone, we will ask you to provide the following information about you:

- ✓ name (last name and patronymic, if you wish);
- ✓ contact phone number;
- ✓ email address.

In addition, other information provided by you in the email will be available to us.

Personal data processed for this purpose are not classified as special or biometric in accordance with Articles 10-11 of Federal Law No. 152-FZ and are processed in an automated manner.

The legal basis for processing of the above mentioned personal data is the Processor's legitimate interest and the agreement with the User, in accordance with paragraphs 5 and 7, part 1 of Article 6 of Federal Law 152-FZ.

Personal data provided by you will be processed within 30 days after processing the request in accordance with part 4 of Article 21 of Federal Law 152-FZ.

Upon expiry of the specified processing time, the User's personal data will be destroyed by deleting from information systems using the built-in features of the information system.

Publication of employee contact details

On our website carltonmoscow.com, we publish information about our employees:

- ✓ last name and first name;
- ✓ current position;
- ✓ place of work;
- ✓ photo;
- ✓ email address;
- ✓ contact phone number.

Personal data processed for this purpose are not classified as special or biometric in accordance with Articles 10-11 of Federal Law No. 152-FZ and are processed in an automated manner.

The above mentioned personal data shall be disseminated pursuant to the Consent to processing of personal data authorized by the personal data subject for dissemination, received from the employee in accordance with Art. 10.1 of Federal Law 152-FZ.

Personal data authorized by an employee for dissemination will be processed within 30 days after termination of employment relations with the employee in accordance with part 4 of Article 21 of Federal Law 152-FZ or after the consent withdrawal in accordance with part 5 of Article 21 of Federal Law 152-FZ, whichever occurs first.

Upon expiry of the specified processing time, the employee's personal data will be destroyed by deleting from information systems using the built-in features of the information system.

Processing of purchase requests for certificates for accommodation, tea ceremony, spa services, restaurant and bar services received through the website carltonmoscow.com.

To send requests for certificates, you can use the form on our website <https://carltonmoscow.com/gifts>. If you contact us via the specified web form, we may need your data to process your request, in particular:

- ✓ last name, first name, and patronymic;
- ✓ email address;
- ✓ contact phone number.

In addition, other information provided by you when ordering the gift certificate will be available to us with the website features.

After the certificate purchase conditions are met, including filling in the application fields, we will send the certificate to your email address.

Personal data processed for this purpose are not classified as special or biometric in accordance with Articles 10-11 of Federal Law No. 152-FZ and are processed in an automated manner.

The legal basis for processing of the above mentioned personal data is the agreement with the User, and the initiative of an individual to conclude the agreement in accordance with paragraph 5,

part 1 of Article 6 of Federal Law 152-FZ.

All data received when processing your request will be stored and processed for 5 years in accordance with Article 24 of the Tax Code of the Russian Federation.

Upon expiry of the specified processing time, the User's personal data will be destroyed by deleting from information systems using the built-in features of the information system.

Processing of personal data of hotel clients

Processing of reservation requests received through the website: carltonmoscow.com

On our website **carltonmoscow.com**, you can book a room you like by filling out the request form. The following information should be specified in the request form:

- ✓ last name, first name, and patronymic (if any);
- ✓ email address;
- ✓ contact phone number;
- ✓ check-in date;
- ✓ departure date;
- ✓ payment method;
- ✓ charge;
- ✓ additional information if you wish;
- ✓ information about guests: last name, first name, and patronymic; citizenship.

Data processed for this purpose are not classified as special or biometric personal data in accordance with Articles 10-11 of Federal Law No. 152-FZ and are processed in an automated manner.

The legal basis for processing of the above mentioned personal data is the agreement – the Online Booking Rules, available in the booking window when booking a room. The personal data of guests are processed as far as guests are beneficiaries under the concluded agreement (in accordance with paragraph 5, part 1 of Article 6 of Federal Law 152-FZ).

All data related to the personal data processing will be stored and processed for 5 years after the fulfillment of obligations to you, in accordance with paragraph 5 of part 3 of Article 24 of the Tax Code of the Russian Federation.

Upon expiry of the specified processing time, the personal data will be destroyed by deleting from information systems using the built-in features of the information system.

Processing of the clients personal data during check-in:

During the client's check-in at the hotel, we collect the following personal data about you:

- ✓ last name, first name, and patronymic;
- ✓ booking number;
- ✓ rate;
- ✓ migration card details;
- ✓ country;
- ✓ birth certificate details (for minors);
- ✓ date of birth;
- ✓ email address;

- ✓ mobile phone number;
- ✓ citizenship;
- ✓ arrival date;
- ✓ room number;
- ✓ identity document details (including a foreign passport);
- ✓ room type;
- ✓ departure date;

Data processed for this purpose are not classified as special or biometric personal data in accordance with Articles 10-11 of Federal Law No. 152-FZ and are processed in an automated manner.

The legal basis for processing of the above mentioned personal data is the agreement with the client in accordance with paragraph 5, part 1 of Article 6 of Federal Law 152-FZ and the legislative provisions of the Russian Federation, in particular the Government Decree of the Russian Federation No. 713 dated 17.07.1995.

All data related to the personal data processing will be stored and processed for 5 years after the client check-in at the hotel in accordance with Article 24 of the Tax Code of the Russian Federation.

Upon expiry of the specified processing time, the personal data will be destroyed by deleting from information systems using the built-in features of the information system.

Processing of personal data in case of refund (recalculation of the amount) for services rendered to hotel clients and contractors

For refund (recalculation of the amount) for the services provided by us, you can use our website: carltonmoscow.com or contact us by email.

For this purpose, we will need the following information about you:

- ✓ place of birth;
- ✓ last name, first name, and patronymic;
- ✓ date of birth;
- ✓ refund amount;
- ✓ identity document details.

Data processed for this purpose are not classified as special or biometric personal data in accordance with Articles 10-11 of Federal Law No. 152-FZ and are processed in an automated manner.

The legal basis for processing of the above mentioned personal data is the agreement with the client in accordance with paragraph 5, part 1 of Article 6 of Federal Law 152-FZ.

All data related to the personal data processing will be stored and processed for 5 years after the fulfillment of obligations to you, in accordance with paragraph 5 of part 3 of Article 24 of the Tax Code of the Russian Federation.

Upon expiry of the specified processing time, the personal data will be destroyed by deleting from information systems using the built-in features of the information system.

Processing of requests received by the Concierge Desk through the website: carltonmoscow.com and by the phone

For requests for additional services (transfer, organization of cultural and leisure events, etc.), you can use the website: carltonmoscow.com, email address or phone number of the Concierge Desk published on the website.

If you contact us using the specified contact methods, we may need your data to process your request, in particular:

- ✓ last name, first name, and patronymic;
- ✓ date of birth;
- ✓ sex;
- ✓ room number;
- ✓ mobile phone number;
- ✓ ticket booking details (date, amount, destination);
- ✓ identity document details

In addition, other information provided by you in the course of the additional service provision will be available to us.

Personal data processed for this purpose are not classified as special or biometric in accordance with Articles 10-11 of Federal Law No. 152-FZ and are processed in an automated manner.

The legal basis for processing of the above mentioned personal data is the agreement with the User, our legitimate interest in processing the personal data of your representatives in accordance with Article 185 of the Civil Code, and the initiative of an individual to conclude the agreement in accordance with paragraphs 5 and 7, part 1 of Article 6 of Federal Law 152-FZ

All data received when processing your request will be stored and processed for 5 years in accordance with Article 24 of the Tax Code of the Russian Federation.

Upon expiry of the specified processing time, the User's personal data will be destroyed by deleting from information systems using the built-in features of the information system.

Website traffic analytics

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 websites to recognize your device.

We want you to feel comfortable using all functions of our website, and for its correct operation we process cookies. They allow us to recognize you when you visit our website or use our services, remember your preferences and provide you with a personalized experience.

According to their purpose, cookies are divided into:

- **Necessary cookies** that help make the website usable by enabling basic functions, such as page navigation and access to secure areas of the website. The website cannot function properly without these cookies;
- **Statistical cookies** that help website owners understand how visitors interact with websites by collecting and reporting information anonymously;
- **Marketing cookies** that are used to track visitors on different websites. They are designed to serve ads that are relevant and attractive to a certain User and thus more valuable to website owners and third-party advertisers.

All the following cookies are used on our website:

Name	Processing purpose	Period of data storage
ym_uid	To differentiate visitors	Until removing from the website
_ym_visorc	It is used for the session replay to work correctly	1 day
_ym_d	Contains the date of the first site visit	1 year
_ym_isad	It is used to determine if a visitor has any ad-blocking software in their browser — this information can be used to make website content inaccessible to visitors if the website is funded by third-party advertising	1 day

You may opt out of the processing of cookies by using the appropriate settings of your browser.

In addition to cookies, we use tracking tools on the websites, such as tags and scripts to collect and store information about you. When you use our services, the following information about you becomes available to us: your IP address, location (country or city), the type and version of your device's operating system, the type and version of the browser on your device, the type of device and its display resolution, the source of your traffic, the language of the operating system and browser, information about age, gender, user ID, as well as information about your online activities.

These tools are used to track your behavior on the website and collect demographic information about our client base in general to improve the services we provide.

Similar to the most other information resources of organizations, our web servers and security systems store some temporary technical data in their log files.

Our websites use cookies and retargeting pixels of the analytical service called Yandex.Metrica. More detailed information about the service is provided in the Transfer to Third Parties section of the Policy.

Non-technical cookies are processed only after consent is obtained via the cookie banner.

Cookies from such third-party services are used by us for statistical, analytical and marketing purposes.

Personal data collected by web analytics services are processed upon prior receipt of the Consent to Processing of Personal Data provided by the User by clicking the "AGREE" button on the cookie banner. The specified cookie banner also contains a hyperlink to the specified Policy.

Personal data processed for this purpose are not classified as special or biometric in accordance with Articles 10-11 of Federal Law No. 152-FZ and are processed in an automated manner.

You may opt out of the installation of cookies from third-party analytical services using the appropriate settings of your browser.

Transfer of data to third parties

To provide services and improve their quality, we share information about you with the following third parties:

Processing purpose	Third Parties and a link to the website, if applicable	Transfer purpose	Third party address
Data storage	Travel Line Group LLC travelline.ru	Providing website maintenance support	43, Krasnoarmeyskaya str., office 400, floor 4, Yoshkar-Ola, Republic of Mari El, 424031
Table reservations in the O2 Restaurant on the website https://o2restaurant.com	Yandex LLC Privacy Policy	Restaurant reservation service provider SmartReserve	16, Lva Tolstogo str., Moscow, 119021
Request processing	Jivo Site LLC www.jivo.ru	PDIS provider for request processing through the website	19, Leninskaya Sloboda str., office 21g1, Moscow, 115280
Collection of web analytics	Yandex LLC Privacy Policy	Yandex.Metrica service provider	16, Lva Tolstogo str., Moscow, 119021
Administration of the database of the O2 restaurant loyalty program	ООО «Эч А Эс» www.hrs.ru	Access and technical support of the loyalty program database	Moscow, ext.ter.g. Tagansky municipal district, 29 Serebryannicheskaya Embankment, floor 6, room. I

Cross-Border Transfers of Personal Data

Purpose of the Cross-Border Transfer: The cross-border transfer of personal data is carried out for the following purposes:

- processing customer and potential customer enquiries;
- use of cloud storage and analytics services;
- providing services on the basis of the concluded contract, including booking and customer support;
- marketing analysis and promotion of services.

2. Recipient countries and legal assessment:

- **USA** - not included in the list of countries that provide adequate protection for the rights of personal data subjects. The transfer is carried out on the basis of the consent of the data subject and using standard contractual clauses ensuring adequate protection of rights.
- **Germany** - is included in the list of countries providing adequate protection of the rights of personal data subjects in accordance with Roskomnadzor Order dated 15.03.2013 ¹ 274.

3. Categories of personal data to be transferred:

- Last name, first name, patronymic;
- E-mail address;
- Phone number;
- Booking information;
- Technical information (IP address, cookies, etc.).

4. Recipients:

- **Meta Platforms Inc. (USA) - targeting and advertising tools;**
- **Hetzner Online GmbH (Германия)** — провайдер сервиса сбора и обработки отзывов гостей, а также предоставления аналитики удовлетворенности клиентов **TrustYou GmbH (Германия)**.

The transfer is carried out in accordance with Article 12 of the Law No. 152-FZ and on the basis of written consent of the subjects expressed by using the appropriate forms on the site.

Processing of personal data using ACS, video surveillance and audio recording

Data Categories:

- Image of the subject (video recording);
- Voice information (audio recording);
- Entry/exit events, action log (ACS data).

Location of Equipment: Photo, video and audio recording equipment will be placed only in publicly accessible areas (lobbies, receptions, entry groups and other public areas of the hotel).

Processing Objectives:

- Ensuring the safety of staff and guests;
- Controlling access to premises;
- Preventing and investigating incidents, crimes and conflicts.

Legal basis for processing:

- Article 6.1.6 of the Law No. 152-FZ - processing for the purpose of realization of legitimate interests of the operator;
- Article 86.2 of the Labor Code of the Russian Federation - necessity for performance of labor contract with respect to employees.

Shelf life:

- Video and audio recordings are retained for a maximum of 30 calendar days, unless otherwise required for internal investigations or at the request of competent authorities.
- Access control records (ACRs) are retained for up to 1 year, depending on internal control policies.

Data Destruction: At the end of the retention period, recordings are destroyed by automatic deletion from storage devices or by the video system's software.

Subjects will be informed of the presence of video surveillance by posting notices in prominent locations at the entrance to the filming area.

Collection of personal data of minors

Our website is not intended for processing personal data of minors under 14 years old. If you have a reason to believe that a child has provided us with his/her personal data, then we ask you to inform us by writing to: reservations@carltonmoscow.com.

Data security

The personal data that we collect and store are considered confidential information. They are protected from loss, alteration or unauthorized access in accordance with the legislation of the Russian Federation in the field of personal data.

For this purpose, we apply legal, organizational and technical measures to ensure the personal data security provided for in Articles 18, 18.1 and 19 of Federal Law 152-FZ, including:

- appointment of a person responsible for the organization of personal data processing;
- appointment of a person responsible for the security of personal data in information systems;
- limitation of the number of persons allowed to process personal data;
- familiarization of subjects with the requirements of federal legislation and regulatory documents of the Processor for the processing and protection of personal data;
- organization of accounting, storage and handling of media containing information with personal data;
- checking the readiness and effectiveness of the use of information security tools;
- differentiation of user access to information resources and information processing hardware and software;
- registration and accounting of actions of users of personal data information systems;
- the use of anti-virus tools and personal data protection system recovery tools;
- the use of firewalling, intrusion detection, security analysis and cryptographic protection tools, if necessary.

Policy Amendment

We reserve the right to make changes to our Policy at any time. We ask you to review all updates to our Policy regularly. We will send notifications of Policy changes if such changes are material in the ways available to us.

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