

Personal Data Processing Policy

1. General Provisions

1.1. This Personal Data Processing Policy (hereinafter referred to as the "Policy") has been developed pursuant to the requirements of Clause 2, Part 1, Article 18.1 of Federal Law No. 152-FZ of July 27, 2006 "On Personal Data" (hereinafter referred to as the "Law on Personal Data") to ensure the protection of human and civil rights and freedoms during personal data processing.

1.2. The Policy governs the processes of personal data processing by the operator — Limited Liability Company "Fort Kolesnik" (INN 7820066749, hereinafter referred to as the "Operator") during the operation of the website located on the Internet at <https://hotelfortkolesnik.ru/> (hereinafter referred to as the "Website").

1.3. For the purposes of this Policy, personal data means any information relating directly or indirectly to an identified or identifiable natural person who is a visitor (user) of the Website (hereinafter referred to as the "Personal Data Subject", "Subject").

2. Principles of Personal Data Processing

The processing of personal data is carried out by the Operator in accordance with the requirements of the legislation of the Russian Federation on the basis of the following principles:

- Lawfulness and fair basis;
 - Limiting the processing of personal data to achieving specific, predetermined, and legitimate purposes;
 - Preventing personal data processing that is incompatible with the purposes of personal data collection;
 - Preventing the merging of databases containing personal data processed for mutually incompatible purposes;
 - Processing only personal data that meets the purposes of its processing;
 - Compliance of the content and scope of processed personal data with the stated purposes of processing;
 - Prevention of processing personal data that is excessive in relation to the stated purposes of processing;
 - Ensuring accuracy, sufficiency, and relevance of personal data in relation to the processing purposes;
 - Destruction of personal data upon achieving the processing purposes or upon loss of the necessity to achieve these purposes, or if violations cannot be rectified by the Operator, unless otherwise provided by Law.
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3. Basic Rights and Obligations of the Operator

3.1. The Operator has the right to:

- Independently determine the composition and list of measures necessary and sufficient to ensure the fulfillment of obligations provided by the Law on Personal Data, unless otherwise provided by law;
- Entrust the processing of personal data to another person with the consent of the personal data subject, based on a contract concluded with that person, unless otherwise provided by federal law;
- Transfer personal data of the Subject to third parties with the Subject's consent or in other cases expressly provided for by legislation;
- Continue processing personal data without the Subject's consent upon revocation of consent by the Subject if there are legal grounds provided by the Law on Personal Data.

3.2. The Operator is obliged to:

- Provide the Subject, upon request, with information regarding the processing of their personal data;

- Use personal data exclusively for the purposes specified in this Policy;
 - Maintain the confidentiality of personal data, not disclose to third parties, and not distribute personal data without the Subject's consent;
 - Take legal, organizational, and technical measures to ensure the confidentiality and security of Subjects' personal data;
 - Block personal data relating to the respective Subject upon request during the verification period in case inaccurate personal data or unlawful actions are detected;
 - Clarify/rectify personal data if inaccuracies are confirmed;
 - Cease processing and destroy personal data (or ensure cessation/destruction by an authorized processor) within a period not exceeding 30 days from achieving the processing purpose;
 - Provide necessary information to the authorized body for personal data protection within 10 days of receiving an inquiry;
 - In the event of an unlawful/accidental transmission/breach of personal data violating Subjects' rights, notify the authorized body within 24 hours of discovering the incident.
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4. Basic Rights of the Personal Data Subject

The Subject has the right to:

- Obtain information regarding the processing of their personal data;
 - Require the Operator to rectify, block, or destroy personal data if it is incomplete, outdated, inaccurate, unlawfully obtained, or unnecessary for the stated purpose;
 - Withdraw previously granted consent and/or submit a demand to cease processing;
 - Take measures provided by Law to protect their rights;
 - Appeal unlawful acts or omissions of the Operator to Roskomnadzor or in court.
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5. Purposes and Conditions of Personal Data Processing

5.1–5.2. Processing is strictly limited to predetermined purposes, and processed data must not be excessive.

5.3. Specific processing purposes:

1. Room booking for hotel accommodation:

- *Data processed:* full name, phone number, email address, citizenship, period of stay, number of guests.
- *Category of subjects:* Website visitors.
- *Legal basis:* Subject's consent.
- *Methods & retention:* Mixed processing via Internet/internal network. Retained until purposes are achieved or consent is withdrawn.

2. Account registration and using Personal Account functionality:

- *Data processed:* first and last name, phone number, email address, booking history.
- *Category of subjects:* Website visitors.
- *Legal basis:* Subject's consent.

3. Providing additional information/feedback upon request:

- *Data processed:* full name, phone number, email address.
- *Legal basis:* Subject's consent.

4. Improving service quality based on Subject reviews:

- *Data processed:* full name (as provided), email address.
- *Legal basis:* Subject's consent.

5. Promotion of goods, works, and services on the market (marketing):

- *Data processed:* full name, email address.
- *Legal basis:* Separate consent of the Subject to receive advertising/informational mailings.

6. Ensuring compliance with tax legislation (issuance of receipts for online payments):

- *Data processed:* full name, email address.
- *Category of subjects:* clients, Website visitors.
- *Legal basis:* fulfillment of statutory obligations imposed on the Operator by Russian law.

7. Collecting statistical data via metric programs (web analytics):

- *Data processed:* cookies (data collected via metric software).
- *Category of subjects:* Website visitors.
- *Legal basis:* Subject's consent.

6. Legal Grounds for Personal Data Processing

6.1. The general legal grounds include the Constitution of the Russian Federation, Civil Code, Tax Code, Federal Law No. 149-FZ, Federal Law No. 152-FZ, and other relevant legal acts.

6.2. Specific grounds include the Subject's consent, contract execution/performance, and statutory obligations of the Operator.

6.5. Consent on the Website is obtained via check-boxes in web forms (performing conclusive actions).

6.6. Marketing emails are sent only upon prior consent in accordance with the Law "On Advertising". The Subject may unsubscribe at any time.

7. Information Collected via Metric Programs (Cookies)

7.1–7.2. The Website uses an informational banner to notify visitors and uses the **Yandex.Metrica** service to analyze actions on the Website.

7.3. Cookies are small text files used to analyze user activity. They do not directly identify the Subject.

7.4–7.5. Subjects can configure their browser to accept or reject cookies or opt-out using the Yandex tool (<https://yandex.ru/support/metrika/general/opt-out.html>).

8. Transfer and Processing by Third Parties

8.2. By using the Website and providing consent, the Subject consents to entrusting data processing to:

- **LLC "Yandex"** (OGRN 1027700229193, Moscow, Lev Tolstoy St., 16) — for web analytics;

- **LLC "1C-Bitrix"** (INN 7717586110, Moscow, Entuziastov Blvd., 2) — for CRM/website operation and marketing mailings;
- **LLC "TRAVEL LINE SYSTEMS"** (INN 1215180595, Yoshkar-Ola, Komsomolskaya St., 112) — for room booking, Personal Account management, and mailings.

8.4. Third-party payment and booking services process data independently if not acting under the Operator's specific instruction.

9. Collection, Storage, and Destruction Procedure

9.1. Personal data of Russian citizens is stored and recorded using databases located within the territory of the Russian Federation.

9.3. Data is stored no longer than required by the processing purposes or applicable laws/contracts.

9.5–9.6. Data is subject to destruction upon achieving purposes, loss of necessity, expiration of terms, revocation of consent, or liquidation of the Operator.

9.7. Physical media are destroyed by burning, shredding, or pulping. Electronic data is deleted/formatted permanently without recovery capability.

10. Data Protection Measures

10.1. The Operator applies legal, organizational, and technical measures: determining security threats, adopting local regulations, appointing responsible persons, using passwords, anti-virus software, and restricting physical access to storage areas.

11. Requests, Rectification, Deletion, and Subject Requests

11.2. A Subject's request must include identity document details, evidence of relations with the Operator, and the Subject's signature (or electronic signature).

11.6. If data is inaccurate, the Operator blocks it and updates it within 7 business days of verification.

11.8. Requests can be sent by mail to: *196605, Russia, Saint Petersburg, Pushkin, Kuzminskoye highway, 66, bldg. 2*, or by email to: info@hotelfortkolesnik.ru.

12. Final Provisions & Operator Details

12.1. The place of consent and performance is the location of the Operator. Applicable law is Russian law.

12.2. The Operator may amend the Policy. New versions take effect upon publication on the Website.

Operator Details:

- LLC "Fort Kolesnik" (ООО «Форт Колесник»)
- INN: 7820066749
- Email: info@hotelfortkolesnik.ru
- Address: 196605, Russia, Saint Petersburg, Pushkin, Kuzminskoye highway, 66, bldg. 2