

**POLICY**  
**Eurasia Management Company, LLC. (Eurasia Business Hotel)**  
**RELATED TO PROCESSING OF PERSONAL DATA**  
**OF THE HOTEL OFFICIAL WEB SITE VISITORS**  
**AND HOTEL GUESTS (SERVICE USERS)**

Eurasia Management Company, LLC (INN 7202146453 PSRN 1067203126682) is a legal entity which is properly founded and registered according to legislation of the Russian Federation. Legal (actual) address: 20, Sovetskaya St., Tyumen, Russia, 625000

**1. GENERAL PROVISIONS**

1.1. The present document determines policy of Eurasia Management Company, LLC on processing and protection of personal data of visitors of the website [www.eurasiahotel.ru](http://www.eurasiahotel.ru) (hereinafter - "Guest, Guests") and also extends in full to all Guests of Eurasia Business Hotel who have carried out actions to book rooms in order to receive hotel services or carried out other necessary actions in order to receive other services provided by the hotel.

1.2. The personal data processing policy of Eurasia Management Company, LLC (hereinafter - "Policy") is developed in compliance with Constitution of the Russian Federation, the Federal law "About personal data" No. 152-FZ of 27.07.2006, the Federal law "About Information, Information Technologies and Information Security" No. 149-FZ of 27.07.2006 and other regulations of the Russian Federation in the field of protection of personal data.

1.3. The present Policy is developed in order to implement requirements of the legislation of the Russian Federation in the field of personal data processing and aimed to provide protection of the rights and freedoms of a person and citizen while processing his personal data, including protection of personal data of Guests from unauthorized access.

1.4. The present Policy applies to all personal data of Guests and information which is processed by Eurasia Management Company, LLC with / without use of automation equipment.

**2. MAIN TERMS AND DEFINITIONS OF THE PRESENT POLICY**

**Eurasia Management Company, Limited Liability Company** (UK Eurasia, LLC, INN 7202146453, PSRN 1067203126682) is a legal entity which is properly registered and is inclusively carrying out hotel activity within activity of Eurasia Business Hotel.

**Guest (Guests)** means visitors of the website [www.eurasiahotel.ru](http://www.eurasiahotel.ru) and Guests of Eurasia Business Hotel who carried out actions to book hotel rooms in order to receive hotel services or carried out necessary actions in order to receive other services provided by the hotel.

**Hotel** is Eurasia Business Hotel located at the address: 20, Sovetskaya St., Tyumen, Tyumen region, Russian Federation, 625000. The specified address is a legal, actual and postal address of the hotel.

**Reception** means the front desk in the hotel where Guests are registered and other services provided by the hotel are settled.

**Website** is the official site of the hotel [www.eurasiahotel.ru](http://www.eurasiahotel.ru).

**Policy** is the present Policy regarding confidentiality and processing of personal data of the hotel official site visitors and Guests of the hotel who have used the services provided by the hotel.

**Personal data** is any information which is related to directly or indirectly defined (or being defined) natural person (data subject, Guest).

**Personal data processing** means any action (operation) or a combination of actions (operations) performed on personal data with use of automation equipment or without use of such means including the data collection, record, systematization, accumulation, storage, specification (updating, change), extraction, use, transfer (distribution, submission, access), depersonalization, blocking, removal, destruction.

**Automated processing of personal data** means processing of personal data using computer devices.

**Transfer of personal data** means actions aimed at disclosure of personal data to a certain person or certain circle of people.

**Blocking of personal data** is temporary termination of personal data processing (with exception of cases when processing is necessary for specification of personal data).

**Destruction of personal data** means actions as the result of which it becomes impossible to restore the content of personal data in an information system of personal data and (or) as a result of which physical media with personal data are destroyed.

**Depersonalization of personal data** means actions as a result of which it becomes impossible to define belonging of the personal data to the specific subject of personal data without use of additional information.

**Subjects of personal data** are Guests themselves.

**An operator** on processing of personal data of Guests is UK Eurasia, LLC.

### 3. PURPOSES OF PERSONAL DATA PROCESSING

3.1. When booking rooms on the website [www.eurasiahotel.ru](http://www.eurasiahotel.ru) (hereinafter – also "Website") or at the front desk of the hotel (as well as ordering other services provided by the hotel) Guest provides the following information:

- Surname, Name, Middle name,
- e-mail address,
- contact phone number,
- other information which is necessary in relation to the booking and/or rendering of other services provided by the hotel (passport data, date of birth, address of registration, residence address, etc.) including guaranteed booking,
- other information about himself which Guest will consider necessary to report.

In case of credit card payment Guest enters on his own the credit card details which are necessary to carry out and process the payment. It should be noted that this data is technically inaccessible to UK Eurasia, LLC and therefore UK Eurasia, LLC has no access, doesn't store and in no way uses data of credit cards of Guests. Confidentiality of such personal information is assured by the bank which has provided the payment service provider (platform).

Guest is notified that during his visit to the Website UK Eurasia, LLC can collect certain information, for example, the used browser, a number of IP address, type of an operating system, its location, requested pages and other data. The obtained information is not associated with the data

which Guest leaves on the Website and it is impossible to identify the personality of the user (Guest) by the automatically obtained data.

3.2. UK Eurasia, LLC carries out processing of personal data of Guests for the following purposes:

**Booking.** UK Eurasia, LLC collects and uses personal data for processing of inquiries of Guest, the booking registration, fast and high-quality consultation on clarifying or updating of the booking, other actions which are directly related to the booking and realization of the right of Guest for the hotel services.

**Other services provided by hotel.** Alongside with hotel services UK Eurasia, LLC provides a number of other services (catering, photo shoots, household services – a laundry, an aqua cleaning, sewing services, rent of a conference room Continental, meeting rooms Asia and Europe and others).

**Bonuses and offers.** Information provided by Guest can be used to create exclusive personal offers, charge points according to bonus programmes.

**Marketing.** UK Eurasia, LLC can use the submitted contact information for sending news, information about special actions and offers (with the consent of Guest to obtain such an information). The website and form of the registration card support receiving a consent of Guest to get newsletters, information on actions and special offers. Familiarization with Policy is not considered as the consent to mailing of the above-mentioned materials and can only be obtained by the hotel in case Guest carries out certain actions for room booking at the Website (puts down a "tick" mark on the point that he agrees to obtain information on actions and special offers of Eurasia Business Hotel by e-mail) and/or when filling the Guest registration card at check-in. Upon refusal of Guest to receive newsletters or not putting down such a "tick" mark the Guest's e-mail address will be immediately removed from the list of recipients (list of mailing).

These actions (removal from the list of mailing) are carried out by the hotel immediately, as soon as it would receive from Guest a written application with a request to stop processing of his personal data, and Guest has the right to refuse processing of his data by the hotel in whole or partially (for example, only regarding mailing of the newsletters, information on actions and special offers).

**Improvement of quality of service in the hotel.** After departure / at departure of Guest from Eurasia Business Hotel, the last can send to Guest a letter/questionnaire with a request to share his impressions of the hotel. Filling of such questionnaires is the exclusive right of Guest.

**Improvement of quality of our service and work of the official site.** UK Eurasia LLC is concerned that all preferences of Guests are quickly considered. UK Eurasia LLC can use the submitted personal data and information on the booking of Guest so that for the next time to offer the most suitable accommodation as fast as possible and at the same time to consider all wishes of Guest.

#### 4. PRINCIPLES AND CONDITIONS OF PERSONAL DATA PROCESSING

4.1. UK Eurasia, LLC carries out Guests' personal data processing on basis of the following principles:

- processing of personal data is carried out on legal basis;
- personal data processing is limited to achievement of specific, pre-defined and lawful purpose. Only personal data which corresponds to purposes of its processing is subject to processing.

Personal data processing incompatible with the purpose of collecting of personal data is not allowed;

- the processed personal data shall be destroyed or depersonalized when need for achievement of the purpose of its processing is lost if the other is not established or will not be established by the federal law.

4.2. UK Eurasia, LLC shall carry out personal data processing under at least one of the following conditions:

- personal data processing is carried out with the consent of Guest: being a user of the website [www.eurasiahotel.ru](http://www.eurasiahotel.ru). Guest provides UK Eurasia, LLC with his personal data and gives full and unconditional consent to its processing. Guest can provide his personal data and consent to its processing at arrival to the hotel.
- at arrival of Guest to the hotel, he provides the personal data to UK Eurasia, LLC and gives full and unconditional consent to its processing by signing a registration card.
- receiving the Guest's consent to processing of his personal data is a necessary condition for making a booking. The booking is impossible and won't be completed without receiving the Guest's consent to processing of his personal data.
- personal data processing is necessary for achievement of the purposes, stipulated by the legislation.
- personal data processing is necessary for UK Eurasia, LLC to fulfill its obligations to Guests, including conclusion and performance of a contract according to which Guest is a consumer of hotel and other services.

4.3. Confidentiality. UK Eurasia, LLC guarantees confidentiality of the obtained personal data of Guests and can transfer them to the third parties only within the actual legislation (for example, to law enforcement agencies, under inquiries of court, etc.).

## 5. RIGHTS OF THE SUBJECT OF PERSONAL DATA

5.1. According to the Federal law "About personal data" No. 152-FZ of 27.07.2006 Guest whose personal data is processed by UK Eurasia, LLC has the right to get information concerning processing of his personal data as well containing the following:

- confirmation of the fact of personal data processing by UK Eurasia, LLC,
- legal grounds and purposes of personal data processing;
- the ways of personal data processing applied by the Operator;
- name and location of UK Eurasia, LLC;
- processed personal data related to the appropriate subject of personal data, a source of its obtaining if another way of submission of such data is not stipulated by federal law;
- terms of personal data processing, including terms of its storage;
- a manner of realization of rights of a subject of personal data by the data subject which is stipulated by the Federal law "About personal data" No. 152-FZ of 27.07.2006;
- other data provided by the Federal law "About personal data" No. 152-FZ of 27.07.2006 or other federal laws.

5.2. The information can only be submitted to the subject of personal data on condition that the data subject provides the proof of belonging of the inquired personal data to him.

5.3. According to Art. 14 of the Federal law "About personal data" No. 152-FZ of 27.07.2006 the subject of personal data has the right to demand specification of his personal data, their blocking or destruction.

If Guest's personal data which are in possession of UK Eurasia, LLC are not relevant any more, UK Eurasia, LLC will update them at the request of Guest. Guest has the right to submit such requests for updating as well as blocking or destruction of personal data to the hotel e-mail [reservation@eurasiahotel.ru](mailto:reservation@eurasiahotel.ru) or by Russian Post to the address: 20, Sovetskaya St., Tyumen, Tyumen region, 625000, Russian Federation.

In the official request to UK Eurasia, LLC it is necessary to specify:

- Surname, Name, Middle name;
- number of the main identity document of the subject of personal data or his representative, date of issue of the specified document and the authority which has issued it;
- the data which confirms that Guest used the Website, or the data otherwise confirming that the personal data is processed by UK Eurasia, LLC (for example, in case of room booking directly in the hotel).

The inquiry must be signed by the citizen (or his lawful representative). If the inquiry is sent in electronic form, it has to be issued in the form of an electronic document according to requirements of legislation of the Russian Federation.

5.4. UK Eurasia, LLC can store some of the personal information provided by Guest, for example, in administrative purposes.

## 6. COOKIE FILES

6.1. "Cookie" files are the small files with information on checked pages and settings which remain on computers of users.

6.2. For the purpose of improvement of functions of Website UK Eurasia, LLC uses cookie files of various types (technical, functional, commercial, analytical, etc.).

If Guest doesn't want cookie files to be stored on his device, it is necessary to adjust the browser accordingly. However in case of shutdown of certain cookie files some functions of Website can appear inaccessible to Guest.

## 7. MEASURES OF PERSONAL DATA PROTECTION

7.1. In order to prevent unauthorized access, not stipulated transfer of personal data to the third parties, inappropriate use of the obtained information and other illegal actions, UK Eurasia, LLC uses legal, organizational (corporate), technical and other measures of protection which are not forbidden by legislation of the Russian Federation.

## 8. FINAL PROVISIONS

8.1. In case of non-fulfilment of provisions of the present Policy UK Eurasia, LLC bears responsibility according to the current legislation of the Russian Federation.

8.2. UK Eurasia, LLC can modify the present Policy. Actual version is published on the official site of the hotel [www.eurasiahotel.ru](http://www.eurasiahotel.ru).