

PERSONAL DATA PROCESSING POLICY. LIMITED LIABILITY COMPANY “BESTTRIP”

1. General Provisions

- 1.1. For the purpose of fulfilling the requirements of the current legislation of the Russian Federation, LLC “BESTTRIP” (TIN 9714046198, address: 125284, city of Moscow, Leningradsky Avenue, building 31A, structure 1, premises 4/5, hereinafter also referred to as the **Company** or the **Operator**) considers as its most important priority the observance of the principles of legality, fairness and confidentiality in the processing of personal data, as well as ensuring the confidentiality of the data processing.
- 1.2. This Personal data processing policy (hereinafter – the Policy) is characterized by the following:
 - 1.2.1. developed for the purpose of implementing the requirements of the current legislation of the Russian Federation in the field of processing and protection of personal data;
 - 1.2.2. discloses the methods and principles of processing of personal data by the Operator, the rights and obligations of the Operator in the processing of personal data, the rights of personal data subjects, and also includes a list of measures applied by the Operator for the purpose of ensuring the confidentiality of personal data during their processing;
 - 1.2.3. is a publicly available document declaring the conceptual principals of the Operator’s personal data processing activities.
- 1.3. The Operator, prior to the commencement of the processing of personal data, has notified the authorized government body for the protection of the rights of personal data subjects of its intention to carry out the processing of personal data. The Operator updates the information specified in the notification in timely manner.
- 1.4. The processing of personal data must be limited to achieving specific, predetermined and lawful purposes. The personal data subject, prior to giving consent to the processing of his personal data, must be informed of the purposes of their processing. The purposes of processing must be included into the consent of the personal data subject, if the processing of personal data is carried out on the ground of consent. Processing of personal data incompatible with the purposes of collection of personal data is not permitted.

2. Basic Concepts Used in the Policy

- Personal data – any information relating to a directly or indirectly identified or identifiable natural person (personal data subject).
- Personal data operator (operator) – the Company, independently or jointly with other persons organizing and (or) carrying out the processing of personal data, as well as determining the purposes of processing of personal data, the composition of personal data subject to processing, the actions (operations) performed with personal data.
- Person carrying out processing of personal data – a state authority, municipal authority, legal entity or natural person carrying out the processing of personal data on behalf of the personal data operator with the consent of the personal data subject, unless otherwise provided by federal laws, but not determining the purposes of processing of such personal data, the composition of personal data, the actions performed with the consent of the personal data subject, unless otherwise предусмотрено by federal laws, but not determining the purposes of processing of the specified personal data, the composition of personal data, the actions performed with personal data.
- personal data subject (subject) – a person to whom the relevant personal data relate;
- Processing of personal data – any action (operation) or a set of actions (operations) with personal data, performed with the use of automation tools or without the use of such tools. Processing

of personal data includes, inter alia: collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, transfer (dissemination, provision, access), depersonalization, blocking, deletion, destruction.

- Automated processing of personal data – processing of personal data using computing equipment.
- Dissemination of personal data – actions aimed at disclosure of personal data to an indefinite circle of persons.
- Provision of personal data – actions aimed at disclosure of personal data to a specific person or a specific circle of persons.
- Blocking of personal data – temporary cessation of processing of personal data (except in cases where processing is necessary for clarification of personal data).
- Destruction of personal data – actions as a result of which it becomes impossible to restore the content of personal data in the personal data information system and (or) as a result of which material carriers of personal data are destroyed.
- Depersonalization of personal data – actions as a result of which it becomes impossible, without the use of additional information, to determine the belonging of personal data to a specific personal data subject.
- Personal data information system – a set of personal data contained in databases and information technologies and technical means ensuring their processing.
- Cross-border transfer of personal data – transfer of personal data to the territory of a foreign state to a state authority of a foreign state, a foreign natural person or a foreign legal entity.
- Special categories of personal data – special categories of personal data relating to racial, national belonging, political views, religious or philosophical beliefs, health condition and intimate life.
- Biometric personal data – information that characterizes physiological and biological features of a person, on the basis of which his identity can be established, and which are used by the operator to establish the identity of the personal data subject.
- Publicly available sources of personal data – publicly available data sources into which personal data reported by the personal data subject may be included with the written consent of the personal data subject.
- Person responsible for organizing the processing of personal data – a natural or legal person appointed by the Company responsible for organizing the processing of personal data.

3. Basic Rights and Obligations of the Operator

3.1. The Operator has the right:

3.1.1. to receive from the personal data subject reliable information and/or documents containing personal data;

3.1.2. to require from the personal data subject timely clarification of the provided personal data for the purpose of ensuring the accuracy, sufficiency and relevance of personal data.

3.2. The Operator is obliged:

3.2.1. to process personal data in the manner established by the current legislation of the Russian Federation;

3.2.2. to consider appeals of the personal data subject (his legal representative) on issues of personal data processing and to provide reasoned responses;

3.2.3. to provide the personal data subject (his legal representative) with the opportunity to familiarize himself with his personal data free of charge in the manner provided for by the current legislation of the Russian Federation;

3.2.4. to take measures for clarification, destruction of personal data of the personal data subject in connection with his (his legal representative's) appeal with lawful and justified requirements;

3.2.5. to organize the protection of personal data in accordance with the requirements of the legislation of the Russian Federation.

4. Basic Rights and Obligations of Personal Data Subjects

- 4.1. The personal data subject has the right to receive information about the processing of his personal data by the Operator.
- 4.2. The personal data subject has the right to require from the Operator update or correction of these personal data, their blocking or destruction in the event that they are incomplete, outdated, inaccurate, unlawfully obtained or cannot be recognized as necessary for the stated purpose of processing, and also to take measures provided by law to protect his rights.
- 4.3. The right of the personal data subject to access his personal data may be restricted in accordance with federal laws, including if the access of the personal data subject to his personal data violates the rights and legitimate interests of third parties.
- 4.4. For the implementation and protection of his rights and legitimate interests, the personal data subject has the right to direct to the Operator. The Operator considers any appeals and complaints from personal data subjects, carefully investigates facts of violations and takes all necessary measures for their immediate elimination, takes necessary measures to responsible persons and settlement of disputed and conflict situations in a pre-trial procedure within the time limits established by the current legislation of the Russian Federation.
- 4.5. The personal data subject has the right to withdraw consent to the processing of personal data.
- 4.6. The personal data subject is obliged to provide the Operator only reliable data about himself, as well as to provide documents containing personal data in the amount necessary for the purpose of processing.
- 4.7. The personal data subject is obliged to timely inform the Operator about clarification (updating, modification) of his personal data.
- 4.8. A person who has provided the Operator with unreliable information about himself, or information about another personal data subject without the consent of the latter, is responsible in accordance with the legislation of the Russian Federation.

5. Purposes of Personal Data Collection

- 5.1. Processing of personal data in the Company is limited to achieving specific, predetermined and lawful purposes.
- 5.2. Personal data are processed by the Company for the following purposes:
 - 5.2.1. Ensuring compliance with labor law and other related legislation of the Russian Federation, the rights of employees of the Company;
 - 5.2.2. Selection of candidates and their subsequent employment;
 - 5.2.3. Conclusion and implementation of contracts with counterparties;
 - 5.2.4. Optimization of the operation of the website;
 - 5.2.5. Implementation of access control and internal facility regime;
 - 5.2.6. Implementation of other purposes set by the applicable legislation.
- 5.3. The Company does not process personal data incompatible with the purposes of personal data collection.
- 5.4. The merging of databases containing personal data, the processing of which is carried out for purposes that are incompatible with each other, is not permitted.

6. Legal Grounds for Personal Data Processing

- 6.1. The Policy has been developed in accordance with the current legislation of the Russian Federation in the field of processing and protection of personal data.
- 6.2. The legal grounds for the processing of personal data, in accordance with which the Company carries out the processing of personal data, in addition to the legislation of the Russian Federation in the field of processing and protection of personal data, include:
 - 6.2.1. contracts concluded between the Company and personal data subjects;
 - 6.2.2. consents of personal data subjects to the processing of personal data;

- 6.2.3. other grounds where consent to the processing of personal data is not required by virtue of law.
- 6.3. In execution of the Policy, the head of the Operator has adopted relevant local acts in the field of processing and protection of personal data.

7. Scope and Categories of Processed Personal Data, Categories of Personal Data Subjects

- 7.1. The Operator in its activities ensures compliance with the principles of personal data processing specified in Article 5 of Federal Law dated 27.07.2006 No. 152-FZ “On Personal Data”.
- 7.2. The attributes of personal data and their categories, taking into account the purposes of personal data processing, as well as the categories of personal data subjects whose data are processed by the Operator, is determined in the internal documents of the Operator in relation to each purpose of processing.
- 7.3. The Operator ensures the compliance of the content and volume of processed personal data with the stated purposes of processing and, if necessary, takes measures to eliminate their excessiveness in relation to the stated purposes of processing.
- 7.4. If necessary to process special category of personal data, the Operator processes such category of personal data provided that written consent of the relevant personal data subjects is obtained, as well as in other cases provided for by the legislation of the Russian Federation.

8. Procedure and Conditions of Personal Data Processing

- 8.1. Processing of personal data is carried out by the Operator subject to obtaining the consent of the personal data subject, except for cases when the processing of personal data may be carried out without such consent according to the legislation of Russian Federation.
- 8.2. The personal data subject makes a decision on providing his personal data and gives consent freely, of his own will and in his own interest. Consent to the processing of personal data must be specific, subject-oriented, informed, conscious and unambiguous.
- 8.3. Consent shall be given in any form allowing confirmation of the fact of its receipt. In cases provided for by the legislation of the Russian Federation, consent is formalized in written form.
- 8.4. Consent may be withdrawn by sending a notification to the address of the Operator.
- 8.5. Processing of personal data by the Operator is carried out in the following ways:
 - 8.5.1. non-automated processing of personal data;
 - 8.5.2. automated processing of personal data with transmission of the received information via information and telecommunication networks or without such transmission;
 - 8.5.3. mixed processing of personal data.
- 8.6. The Operator does not make decisions that give rise to legal consequences in relation to personal data subjects or otherwise affect their rights and legitimate interests, based solely on automated processing of their personal data.
- 8.7. Processing of personal data by the Operator includes collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, transfer (dissemination, provision, access), depersonalization, blocking, deletion, destruction of personal data.
- 8.8. The Operator has the right to transfer personal data to bodies of inquiry and investigation, and other authorized bodies in the manner and under the conditions provided for by the current legislation of the Russian Federation.
- 8.9. In cases of necessity of interaction with third parties within the framework of achieving the purposes of personal data processing, the Operator, for the purpose of achieving the purposes of processing, has the right to transfer personal data to authorized third parties in the manner and under the conditions provided for by the current legislation of the Russian Federation.

- 8.10. The Operator creates sources of personal data of the Operator's employees (directories, address books), accessible to the employees of the Operator.
- 8.11. The periods of personal data processing are determined in accordance with the purposes for which they were collected, as well as the obtained consents to the processing of personal data.
- 8.12. The Operator has established the following conditions for termination of personal data processing:
 - 8.12.1. achievement of the purposes of personal data processing and/or expiration of storage periods;
 - 8.12.2. loss of necessity in achieving the purposes of personal data processing;
 - 8.12.3. provision by the personal data subject or his legal representative of information confirming that the personal data are unlawfully obtained or are not necessary for the stated purpose of processing;
 - 8.12.4. impossibility of ensuring the lawfulness of personal data processing;
 - 8.12.5. withdrawal by the personal data subject of consent to the processing of personal data, if retention of personal data is no longer required for the purposes of personal data processing or in connection with the requirements of the current legislation of the Russian Federation;
 - 8.12.6. expiration of limitation periods for legal relations within the framework of which the processing of personal data is carried out or was carried out;
 - 8.12.7. other grounds provided for by the current legislation of the Russian Federation.
- 8.13. Storage of personal data is carried out in a form allowing identification of the personal data subject, for a period no longer than required by the purposes of personal data processing, except in cases where the storage period of personal data is established by federal law, a contract to which the personal data subject is a party, beneficiary or guarantor.
- 8.14. When carrying out storage of personal data, the Operator uses databases located on the territory of the Russian Federation. When collecting personal data, including via the information and telecommunication network "Internet", recording, systematization, accumulation, storage, clarification (updating, modification), extraction of personal data of citizens of the Russian Federation using databases located outside the territory of the Russian Federation is not permitted.

9. Measures for Proper Organization of Processing and Ensuring the Security of Personal Data

- 9.1. When processing personal data, the Operator takes all necessary legal, organizational and technical measures to protect them from unlawful or accidental access, destruction, modification, blocking, copying, provision, dissemination, as well as from other unlawful actions. Ensuring the security of personal data is achieved, in particular, by the following methods:
 - 9.1.1. appointment of a person responsible for organizing the processing of personal data;
 - 9.1.2. implementation of internal control and/or audit of compliance of personal data processing with Federal Law dated 27.07.2006 No. 152-FZ "On Personal Data" and other regulatory legal acts adopted in accordance with it, local acts of the Operator;
 - 9.1.3. familiarization of the Operator's employees directly carrying out the processing of personal data with the provisions of the legislation of the Russian Federation on personal data, including requirements for the protection of personal data, local acts regarding the processing of personal data and (or) training of the said employees;
 - 9.1.4. determination of threats to the security of personal data during their processing in personal data information systems;
 - 9.1.5. application of organizational and technical measures to ensure the security of personal data during their processing in personal data information systems;
 - 9.1.6. assessment of the effectiveness of the measures taken to ensure the security of personal data prior to putting into operation the personal data information system;

- 9.1.7. accounting of machine carriers of personal data;
- 9.1.8. identification and detection of facts of unauthorized access to personal data and taking appropriate measures;
- 9.1.9. restoration of personal data modified or destroyed as a result of unauthorized access to them;
- 9.1.10. establishment of rules of access to personal data processed in the personal data information system, as well as ensuring registration and accounting of all actions performed with personal data in the personal data information system;
- 9.1.11. control over the measures taken to ensure the security of personal data and the level of protection of personal data information systems;
- 9.1.12. other methods, means and requirements provided for by the current legislation of the Russian Federation, as well as local acts of the Operator.

10. Person Responsible for Organizing the Processing of Personal Data

- 10.1. The rights, obligations and legal responsibility of the person responsible for organizing the processing of personal data are established by Federal Law dated 27.07.2006 No. 152-FZ “On Personal Data” and local acts of the Operator.
- 10.2. Appointment of the person responsible for organizing the processing of personal data and release from the specified duties is carried out by an order of the sole executive body of the Operator. When appointing the person responsible for organizing the processing of personal data, the powers, competencies and personal qualities of the official are taken into account, allowing him to properly and fully exercise his rights and perform his duties.
- 10.3. The person responsible for organizing the processing of personal data:
 - 10.3.1.1. organizes the implementation of internal control over compliance by the Operator and its employees with the legislation of the Russian Federation on personal data, including requirements for the protection of personal data;
 - 10.3.1.2. brings to the attention of the Operator’s employees the provisions of the legislation of the Russian Federation on personal data, local acts on issues of personal data processing, or ensures their communication;
 - 10.3.1.3. exercises control over the receipt and processing of appeals and requests of personal data subjects or their representatives.
- 10.3.2. Appeals (requests) of personal data subjects on issues of personal data processing shall be sent to the Company at the email address: reservation@besttrip.pro.

11. Withdrawal of Consent, Updating, Correction, Deletion and Destruction of Personal Data, Responses to Requests of Subjects for Access to Personal Data

- 11.1. In case of confirmation of the fact of inaccuracy of personal data or unlawfulness of their processing, the personal data shall be subject to updating by the Operator, or their processing must be terminated accordingly.
- 11.2. Upon request of the personal data subject or his representative, the Operator is obliged to provide information about the processing of personal data of the specified subject carried out by it.
- 11.3. Unless otherwise provided by the legislation of the Russian Federation, the request must contain:
 - 11.3.1. the number of the main document certifying the identity of the personal data subject or his representative,
 - 11.3.2. information about the date of issuance of the specified document and the issuing authority,
 - 11.3.3. information confirming the participation of the personal data subject in relations with the Operator (contract number, date of conclusion of the contract, conditional verbal designation and (or) other information), or information otherwise confirming the fact of processing of personal data by the Operator,
 - 11.3.4. the signature of the personal data subject or his representative.

- 11.4. The request may be sent in electronic form, in the form of an electronic document and signed with an electronic signature in accordance with the legislation of the Russian Federation.
- 11.5. If the request of the personal data subject does not contain all the information necessary to confirm the rights of the subject, or the subject does not have the rights of access to the requested information, then a clarifying request and/or a reasoned refusal shall be sent to him respectively.
- 11.6. In the manner provided for in clause 11.3, the personal data subject has the right to require from the Operator clarification of his personal data, their blocking or destruction in the event that the personal data are incomplete, outdated, inaccurate, unlawfully obtained or are not necessary for the stated purpose of processing, as well as to take measures provided for by law to protect his rights.
- 11.7. The subject has the right to withdraw consent to the processing of his personal data by applying to the Operator. Such withdrawal must contain information allowing reliable identification of such subject and the fact of processing of his personal data by the Operator.
- 11.8. Upon achievement of the purposes of personal data processing, as well as in case of withdrawal by the personal data subject of consent, personal data shall be subject to destruction if:
 - 11.8.1. otherwise is not provided for by a contract to which the personal data subject is a party, beneficiary or guarantor;
 - 11.8.2. the Operator is not entitled to carry out processing without the consent of the personal data subject on the grounds provided for by the Federal Law "On Personal Data" or other federal laws;
 - 11.8.3. otherwise is not provided for by another agreement between the Operator and the personal data subject or by the current legislation of the Russian Federation.

12. Confidentiality

- 12.1. The Operator ensures the confidentiality of personal data of personal data subjects.
- 12.2. The Operator does not disclose to third parties and does not disseminate personal data without the consent of the personal data subject, unless otherwise provided by legislation.
- 12.3. In relation to the personal data of the personal data subject, its confidentiality is preserved, except for cases of processing of personal data, access to which is provided to an unlimited circle of persons by the subject with his consent or at his request. The Company has the right to transfer personal information of the personal data subject to third parties in the following cases:
 - 12.3.1. the subject has given his consent to such actions;
 - 12.3.2. the transfer is necessary for achieving the purposes, implementation and execution of functions, powers and duties imposed by legislation;
 - 12.3.3. in other cases provided for by the current legislation.

13. Liability

- 13.1. Persons guilty of violating the norms regulating the processing and protection of personal data bear responsibility provided for by the legislation of the Russian Federation, local acts of the Operator and agreements (contracts) regulating legal relations of the Operator with third parties.

14. Access to the Policy

- 14.1. The current version of the Policy is stored at the location address of the Operator.
- 14.2. The electronic version of the current version of the Policy is publicly available on the Operator's website on the Internet at: besttrip.ru

15. Amendments

- 15.1. The Policy is approved and put into effect by the sole executive body of the Operator.
- 15.2. The Operator has the right to make amendments to the Policy. When amendments are made, the date of approval of the current version of the Policy is indicated in the title of the Policy.
- 15.3. The Policy is reviewed on a regular basis – at least once every 3 years from the date of the previous review of the Policy. The Policy shall be re-approved if it is amended after the review.
- 15.4. The Policy may be reviewed and re-approved prior to the period specified above due to the amendments made:
 - 15.4.1. to regulatory legal acts in the field of personal data;
 - 15.4.2. to local acts of the Operator regulating the organization of processing and ensuring the security of personal data;
 - 15.4.3. to the processes of personal data processing of the Operator.
- 15.5. All relations concerning the processing of personal data that are not reflected in this Policy are regulated in accordance with the provisions of the legislation of the Russian Federation.
- 15.6. The Operator has the right to make amendments to this Policy without the consent of the personal data subject by publishing a new version of the Policy on the website specified in clause 14.2 of this Policy. The current version of the Policy comes into force from the date of its publication.