

POLICY
OF AUTONOMOUS NON-COMMERCIAL ORGANIZATION "PROJECT OFFICE FOR THE
DEVELOPMENT OF TOURISM AND HOSPITALITY IN MOSCOW"
WITH REGARD TO THE PROCESSING OF PERSONAL DATA
(Privacy Policy)

**Policy of the Autonomous Non-Profit Organization
"Project Office for Development of Tourism and Catering in Moscow
on processing of personal data
(Privacy Policy)**

1. GENERAL PROVISIONS

1.1 This Policy of the Autonomous Non-Profit Organization "Project Office for the Development of Tourism and Hospitality of Moscow" (Privacy Policy) with respect to the processing of personal data (hereinafter - the Policy) is developed to meet the requirements of para. 2 part 1 of Article 18.1 of the Federal Law of July 27, 2006 No. 152-FZ "On Personal Data" (hereinafter - the Personal Data Law) in order to ensure the protection of human and civil rights and freedoms in the processing of personal data, including the protection of the rights to privacy, personal and family secrecy.

1.2 The Policy applies to all personal data processed by the Autonomous Nonprofit Organization "Project Office for the Development of Tourism and Hospitality of Moscow", address: 125009, Moscow, Tverskaya Street, Tverskaya Street, 5 A, telephone number + 7 (495) 957-96-77, e-mail address: info@welcome.moscow, OGRN 1187700020947, TIN 7703468243, hereinafter referred to as the Operator, the Organization.

1.3 The Policy defines the basic rights and obligations of the Operator and Personal Data Subjects, the purposes of personal data processing, the legal basis for personal data processing, categories of processed personal data, categories of Personal Data Subjects, the procedure and conditions of personal data processing, as well as measures to ensure the security of personal data during its processing, applied by the Organization.

1.4 The Policy applies both before and after the approval of the Policy to the relations in the field of personal data processing, which the Operator has entered into.

1.5 Pursuant to the requirements of Part 2 of Article 18.1 of the Personal Data Protection Act, the Policy is published in freely accessible form in the Internet information and telecommunication network on the Operator's website.

1.6 The control over the fulfillment of the requirements of the Policy is carried out by the authorized persons responsible for the organization of personal data processing by the Operator.

2. BASIC TERMS AND DEFINITIONS

Personal data - any information relating to a directly or indirectly defined or identifiable natural person (Personal Data Subject).

Personal Data Operator (Operator) - a state authority, municipal authority, legal or natural person, independently or jointly with other persons organizing and/or carrying out the processing of personal data, as well as determining the purposes of personal data processing, the composition of personal data subject to processing, actions (operations) performed with personal data.

Processing of personal data - any action (operation) or set of actions (operations) with personal data, performed with or without the use of means of automation. Processing of personal data includes, inter alia:

- collection;
- recording;
- systematizing;
- accumulation;
- storage;
- clarification (update, change);
- extraction;
- utilization;
- transfer (distribution, provision, access);
- depersonalization;

- blocking;
- deletion;
- destruction.

Automated processing of personal data - processing of personal data by means of computers.

Dissemination of personal data - actions aimed at disclosure of personal data to an indefinite number of persons.

Provision of personal data - actions aimed at disclosure of personal data to a certain person or a certain circle of persons.

Blocking of personal data - temporary cessation of personal data processing (except for cases when processing is necessary to clarify personal data).

Destruction of personal data - actions, as a result of which it becomes impossible to restore the content of personal data in the information system of personal data and/or as a result of which material carriers of personal data are destroyed.

Personal data depersonalization - Actions that make it impossible to determine the affiliation of personal data to a particular personal data subject without the use of additional information.

Personal data information system - personal data contained in databases and the information technologies and technical means that ensure the processing of such data.

Cross-border transfer of personal data - transfer of personal data to the territory of a foreign country to a foreign government authority, a foreign natural person or a foreign legal entity.

3. MAIN RIGHTS AND OBLIGATIONS OF THE OPERATOR

3.1 The Operator shall have the right to:

3.1.1. independently determine the composition and list of measures necessary and sufficient to ensure the fulfillment of obligations stipulated by the Personal Data Law and regulatory legal acts adopted in accordance with it, unless otherwise provided by the Personal Data Law or other federal laws;

3.1.2. to entrust the processing of personal data to another person with the consent of the Personal Data Subject, unless otherwise provided for by federal law, on the basis of a contract concluded with this person. The person processing personal data on behalf of the Operator is obliged to comply with the principles and rules of personal data processing stipulated by the Personal Data Law;

3.1.3. in case the Personal Data Subject revokes his/her consent to personal data processing, the Operator shall have the right to continue personal data processing without the consent of the Personal Data Subject if there are grounds specified in the Personal Data Law.

3.2. The Operator shall:

3.2.1. organize the processing of personal data in accordance with the requirements of the Personal Data Law;

3.2.2. respond to appeals and requests of Personal Data Subjects and their legal representatives in accordance with the requirements of the Personal Data Law;

3.2.3. provide the competent authority for the protection of the rights of Personal Data Subjects (Federal Service for Supervision of Communications, Information Technologies and Mass Media (Roskomnadzor)) with the necessary information at the request of such authority within 30 (thirty) calendar days from the date of receipt of such request.

4. BASIC RIGHTS OF THE PERSONAL DATA SUBJECT

4.1. The Personal Data Subject has the right:

4.1.1. receive information regarding the processing of his/her personal data, except for cases provided for by federal laws. Information shall be provided to the Personal Data Subject by the Operator in an accessible form and shall not contain personal data relating to other Personal Data Subjects, unless there

are legal grounds for disclosure of such personal data. The list of information and the procedure for obtaining it is established by the Personal Data Law;

4.1.2. demand from the Operator to clarify the personal data of the Personal Data Subject, block or destroy it in case the personal data is incomplete, outdated, inaccurate, illegally obtained or is not necessary for the stated purpose of processing, as well as take measures provided for by law to protect the rights of Personal Data Subjects;

4.1.3. appeal to Roskomnadzor or in court against unlawful acts or omissions of the Operator in the processing of personal data of the Personal Data Subject.

5. PURPOSES OF PERSONAL DATA PROCESSING

5.1 The processing of personal data is limited to the achievement of specific, predetermined and legitimate purposes. Processing of personal data incompatible with the purposes of personal data collection is not allowed.

5.2 Only personal data that meet the purposes of their processing shall be processed.

5.3 The Operator shall process personal data for the following purposes:

- ensuring compliance with the Constitution of the Russian Federation, federal laws and other regulatory legal acts of the Russian Federation;
- carrying out its activities in accordance with the Charter of the Organization;
- exercising the rights and performing the duties of the parties to labor relations;
- attracting and selecting the Operator's job applicants;
- organization of individual (personified) registration of employees in the mandatory pension insurance system;
- completing and submitting required reporting forms to executive authorities and other authorized organizations;
- implementation of civil law relations;
- maintaining accounting records;
- purchasing and/or booking services, as well as providing access to the Moscow Digital Tourism Platform Integrated Information System (RUSSPASS);
- holding contests, reviews and other events;
- implementation of access control.

5.4 Personal data of employees may be processed solely for the purpose of ensuring compliance with laws and other regulatory legal acts.

6. LEGAL BASIS OF PERSONAL DATA PROCESSING

6.1 The legal basis for personal data processing is a set of regulatory legal acts, pursuant to which and in accordance with which the Operator processes personal data, including:

- The Constitution of the Russian Federation;
- Civil Code of the Russian Federation;
- Labor Code of the Russian Federation;
- Tax Code of the Russian Federation;
- Federal Law of January 12, 1996, No. 7-FZ "On Non-Profit Organizations";
- Federal Law of December 06, 2011, No. 402-FZ "On Accounting";
- Federal Law No. 167-FZ dated December 15, 2001 "On Compulsory Pension Insurance in the Russian Federation";
- other normative legal acts regulating relations connected with the activity of the Operator.

6.2 The legal basis for Personal Data Processing is also:

- Operator's Charter;
- contracts concluded between the Operator and Personal Data Subjects;
- consent of the Personal Data Subjects to the processing of personal data.

7. SCOPE AND CATEGORIES OF PROCESSED PERSONAL DATA, CATEGORIES OF PERSONAL DATA SUBJECTS

7.1 The content and scope of processed personal data shall correspond to the stated purposes of processing as provided for in Section 5 of the Policy. Personal data processed shall not be excessive in relation to the stated purposes of processing.

7.2 The Operator may process personal data of the following categories of Personal Data Subjects.

7.2.1 Applicants for employment with the Operator:

- surname, first name, patronymic;
- gender;
- nationality;
- date of birth;
- place of birth;
- contact telephone number
- e-mail address;
- photographic image;
- information on education, work experience, qualifications;
- other personal data provided by candidates in their CVs and cover letters.

7.2.2 Employees and former employees of the Operator:

- surname, first name, patronymic;
- gender;
- nationality;
- date of birth;
- place of birth;
- passport data (passport number, series, by whom and when issued, code of the unit that issued the passport);
- data of the document replacing the passport (name of the document, number, series of the document, by whom and when issued, code of the subdivision that issued the document);
- address of place of residence (registration);
- the address of the place of actual residence;
- contact telephone number;
- e-mail address;
- photographic image;
- information on education, including the following information: level of education, name of educational institution, year of graduation, diploma number, specialty, direction of training, qualification;
- individual taxpayer number (INN);
- insurance number of individual personal account (SNILS);
- information on marital status and family composition;
- information on labor activity, including place of work, insurance (labor) record, position held, transfers to another position;
- information on military registration;
- bank account details;
- information on salary and other payments;
- information on awards and incentives;
- other personal data provided by employees in accordance with the requirements of the legislation of the Russian Federation.

7.2.3 Family members of the Operator's employees:

- surname, first name, patronymic;
- degree of kinship;
- date of birth;
- address of residence (registration);

- other personal data provided by employees in accordance with the requirements of the legislation of the Russian Federation.

7.2.4 Operator's customers and counterparties (individuals and/or individual entrepreneurs):

- surname, first name, patronymic;
- date of birth;
- place of birth;
- passport data (passport number, series, by whom and when issued, code of the unit that issued the passport);
- data of the document replacing the passport (name of the document, number, series of the document, by whom and when issued, code of the subdivision that issued the document);
- address of place of residence (registration);
- the address of the place of actual residence;
- contact telephone number;
- e-mail address;
- individual taxpayer number (INN);
- insurance number of the individual personal account (SNILS);
- bank account details;
- other personal data provided by clients and counterparties (individuals and/or individual entrepreneurs) necessary for conclusion and execution of contracts.

7.2.5 Representatives/employees of the Operator's clients and counterparties (individuals):

- surname, first name, patronymic;
- passport data (passport number, series, by whom and when issued, code of the unit that issued the passport);
- data of the document replacing the passport (name of the document, number, series of the document, by whom and when issued, code of the subdivision that issued the document);
- address of place of residence (registration);
- address of the place of actual residence;
- contact phone number;
- e-mail address;
- job title;
- other personal data provided by representatives/employees of clients and counterparties necessary for conclusion and execution of contracts.

7.2.6 Individuals who have purchased or intend to purchase services of the Organization, services of third parties through the Organization or have no contractual relations with the Organization, provided that their personal data are included in the automated systems of the Organization and processed in accordance with the Personal Data Law:

- surname, first name, patronymic;
- e-mail address
- telephone number;
- date of birth;
- bank card details;
- information about actions performed on the Operator's websites, including welcome.moscow, discovermoscow.com, russpass.ru, as well as information about the devices used (such as geolocation, IP addresses, Cookies).

7.2.7 Participants, jury members, other persons taking part in competitions, shows and other events organized by the Operator (their representatives):

- surname, first name, patronymic;
- gender;

- nationality;
- date of birth;
- place of birth;
- passport data (passport number, series, by whom and when issued, code of the unit that issued the passport);
- data of the document replacing the passport (name of the document, number, series of the document, by whom and when issued, code of the subdivision that issued the document);
- data of the birth certificate (number, series, by whom and when issued);
- address of place of residence (registration);
- address of the place of actual residence;
- contact telephone number;
- e-mail address;
- photographic image;
- video image;
- information on education, including the following information: level of education, name of educational institution, year of graduation, diploma number, specialty/training direction, qualification;
- individual taxpayer number (INN);
- insurance number of individual personal account (SNILS);
- information on marital status and family composition;
- information on labor activity, including place of work, insurance (labor) record, position held, transfers to another position;
- bank account details;
- other personal data provided by employees in accordance with the requirements of the legislation of the Russian Federation.

7.3 The Operator does not process biometric and special categories of personal data concerning race, nationality, political views, religious or philosophical beliefs, state of health, intimate life, except as provided for by the legislation of the Russian Federation.

8. PROCEDURE AND CONDITIONS OF PERSONAL DATA PROCESSING

8.1 The Operator shall process personal data in accordance with the requirements of the legislation of the Russian Federation.

8.2 The Operator shall collect, record, systematize, accumulate, store, clarify (update, change), extract, use, transfer (disseminate, provide, access), depersonalize, block, delete and destroy personal data.

8.3 The Operator shall process personal data in the following ways:

- non-automated Processing of personal data;
- automated Processing of personal data with or without transmission of the received information via information and telecommunication networks.

8.4 Processing of personal data shall be carried out with the consent of Personal Data Subjects to the processing of their personal data, as well as without such consent in cases provided for by the legislation of the Russian Federation, namely:

- Processing of personal data is necessary to achieve the purposes stipulated by the international treaty of the Russian Federation or by law, to implement and fulfill the functions, powers and duties assigned to the operator by the legislation of the Russian Federation;
- Processing of personal data is carried out in connection with the participation of a person in constitutional, civil, administrative, criminal proceedings, proceedings in arbitration courts;
- Processing of personal data is necessary for the execution of a judicial act, act of another authority or official, subject to execution in accordance with the legislation of the Russian Federation on enforcement proceedings;

- Personal data processing is necessary for the execution of an agreement to which the Personal Data Subject is a party, beneficiary or guarantor, as well as for the conclusion of an agreement at the initiative of the Personal Data Subject or an agreement under which the Personal Data Subject will be a beneficiary or guarantor;
- Processing of personal data is necessary for protection of life, health or other vital interests of the Personal Data Subject, if it is impossible to obtain the consent of the Personal Data Subject;
- Processing of personal data is necessary to exercise the rights and legitimate interests of the Operator or third parties, including in cases provided for by the Federal Law "On Protection of Rights and Legitimate Interests of Individuals in Overdue Debt Recovery Activities and on Amendments to the Federal Law "On Microfinance Activities and Microfinance Organizations", or to achieve socially significant goals, provided that the rights and freedoms of the Personal Data Subject are not violated;
- Processing of personal data is necessary to carry out professional activities of a journalist and/or legitimate activities of a mass media outlet or scientific, literary or other creative activity, provided that the rights and legitimate interests of the Personal Data Subject are not violated;
- Processing of personal data is carried out for statistical or other research purposes, except for the purposes specified in Article 15 of the Personal Data Law, subject to mandatory depersonalization of personal data;
- Processing of personal data obtained as a result of depersonalization of personal data is carried out in order to improve the efficiency of state or municipal administration, as well as for other purposes provided for by Federal Law No. 123-FZ of April 24, 2020 "On conducting an experiment to establish special regulation to create the necessary conditions for the development and implementation of artificial intelligence technologies in the subject of the Russian Federation - the city of federal significance Moscow and amendments to Articles 6 and 10 of the Law of the Russian Federation - the city of federal significance Moscow".
- Processing of personal data subject to publication or mandatory disclosure in accordance with the federal law.

8.5 The Operator's employees whose job description includes Personal Data Processing shall be allowed to Process Personal Data.

8.7 It is not permitted to disclose and disseminate personal data to third parties without the consent of the Personal Data Subject, unless otherwise provided by the Personal Data Law. The consent to the processing of personal data authorized by the Personal Data Subject for dissemination shall be executed separately from other consents of the Personal Data Subject to the processing of his/her personal data.

8.8. The transfer of personal data to the bodies of inquiry and investigation, the Federal Tax Service, the Pension Fund of the Russian Federation, the Social Insurance Fund and other authorized executive authorities and organizations is carried out in accordance with the requirements of the legislation of the Russian Federation.

8.9. The Operator shall take the necessary legal, organizational and technical measures to protect personal data from unlawful or accidental access, destruction, modification, blocking, dissemination and other unauthorized actions, including:

- identifies threats to the security of personal data during their processing;
- adopts local regulatory acts and other documents regulating relations in the field of personal data processing and protection;
- appoints persons responsible for ensuring the security of personal data in the structural subdivisions and information systems of the Operator;
- creates necessary conditions for working with personal data;
- organizes accounting of documents containing personal data;
- organizes work with information systems by means of which personal data are processed;
- stores personal data in conditions that ensure their safety and prevent unauthorized access to them;
- organizes training of the Operator's employees who process personal data.

8.10. The Operator shall store personal data in a form that allows identification of the Personal Data Subject for no longer than required by the purposes of Personal Data Processing, unless the period of personal data storage is specified by the Personal Data Law and a contract.

8.11. When collecting personal data, including through the information and telecommunications network Internet, the Operator shall ensure recording, systematization, accumulation, storage, clarification (update, change), extraction of personal data of citizens of the Russian Federation using databases located on the territory of the Russian Federation, except for cases specified in the Personal Data Law.

9. UPDATE, CORRECTION, DELETION AND DESTRUCTION OF PERSONAL DATA, RESPONDING TO REQUESTS FROM INDIVIDUALS TO ACCESS THEIR PERSONAL DATA

9.1. Confirmation of the fact of personal data processing by the Operator, legal grounds and purposes of personal data processing, as well as other information specified in part 7 of Article 14 of the Personal Data Law shall be provided by the Operator to the Personal Data Subject or his/her representative upon application or upon receipt of a request from the Personal Data Subject or his/her representative.

The information provided shall not include personal data related to other personal data subjects, except for cases when there are legal grounds for disclosure of such personal data.

9.1.1. The request shall contain:

- the number of the main identity document of the Personal Data Subject or his/her representative, information on the date of issue of the said document and the issuing authority;
- information confirming the Personal Data Subject's participation in relations with the Operator (contract number, date of contract, conventional verbal designation and/or other information), or information otherwise confirming the fact of personal data processing by the Operator;
- signature of the Personal Data Subject or his/her representative.

9.1.2. The request may be sent in the form of an electronic document and signed with an electronic signature in accordance with the legislation of the Russian Federation.

9.1.3 If the appeal (request) of the personal data subject does not reflect all necessary information in accordance with the requirements of the Personal Data Law or the subject does not have the right to access the requested information, a reasoned refusal shall be sent to the subject.

9.1.4. The right of the Personal Data Subject to access his/her personal data may be restricted in accordance with part 8 of Article 14 of the Personal Data Law, including if the access of the Personal Data Subject to his/her personal data violates the rights and legitimate interests of third parties.

9.2. In case of detection of inaccurate personal data upon application of the Personal Data Subject or his/her representative or at their request or at the request of Roskomnadzor, the Operator blocks personal data related to this Personal Data Subject from the moment of such application or receipt of the said request for the period of verification, if blocking of personal data does not violate the rights and legitimate interests of the Personal Data Subject or third parties.

9.2.1 If the fact of inaccuracy of personal data is confirmed, the Operator, based on the information submitted by the Personal Data Subject or his/her representative or Roskomnadzor, or other necessary documents, shall clarify the personal data within 7 (seven) business days from the date of submission of such information and terminate blocking of personal data.

9.3. In case of detection of unlawful Processing of personal data upon application (request) of the Personal Data Subject or his/her representative or Roskomnadzor, the Operator shall block the unlawfully processed personal data related to this Personal Data Subject from the moment of such application or request.

9.4. When the purposes of Personal Data Processing are achieved, as well as in the event that the Personal Data Subject revokes his/her consent to the Processing of Personal Data, the Personal Data shall be destroyed, unless:

- otherwise is not stipulated by the contract to which the Personal Data Subject is a party, beneficiary or guarantor;

- the Operator is not entitled to carry out Personal Data Processing without the consent of the Personal Data Subject on the grounds stipulated by the Personal Data Law or other federal laws;
- unless otherwise provided for by another agreement between the Operator and the Personal Data Subject.