Personal Data Processing Policy

1 General provisions

This Personal data processing policy is drawn up in accordance with the requirements of Federal Law от 27.07.2006. No. 152-FZ of 27.07.2006 "On Personal Data" (hereinafter – referred to as the Personal Data Law) and defines the procedure for processing personal data and measures to ensure the security of personal data of Arfa Park Hotel (Gallery-Maykop Limited Liability Company") then – the Operator.

1.1 The Operator sets as its most important goal and condition for carrying out its activities the observance of human and civil rights and freedoms when processing their personal data, including the protection of the rights to privacy, personal and family secrets.

1.2 The Operator's current policy regarding the processing of personal data (hereinafter – referred to as the Policy) applies to all information that the Operator can receive about website visitors https://arfa-hotel.ru.

2 Basic concepts used in the Policy

2.1 Automated processing of personal data – processing of personal data c using computer technology;

2.2 Blocking of personal data – temporary termination of processing of personal data (except for cases when processing is necessary to clarify personal data);

2.3 Website– a set of graphic and informational materials, as well as computer programs and databases that ensure their availability on the Internet at a network address https://arfa-hotel.ru;

2.4 Personal data information system — a set of personal data contained in databases and information technologies and technical means that ensure their processing;

2.5 Depersonalization of personal data — actions that make it impossible to determine whether personal data belongs to a specific User or other personal data subject without using additional information;

2.6 Processing of personal data – any action (operation) or a set of actions (operations) performed with or without the use of automation tools with personal data, including collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, transfer (distribution, provision, access) depersonalization, blocking, deletion, or destruction of personal data;

2.7 Personal data – any information related directly or indirectly to a specific or identifiable User of the website https://arfa-hotel.ru;

2.8 User – any user of the website https://arfa-hotel.ru;

2.9 Provision of personal data – actions aimed at disclosing personal data to a certain person or a certain group of persons;

2.10 Dissemination of personal data – any actions aimed at disclosing personal data to an indefinite group of persons (transfer of personal data) or at making personal data available to an unlimited number of persons, including publishing personal data in the mass media, posting it in information and telecommunications networks, or providing access to personal data in any other way;

2.11 Cross-border transfer of personal data–transfer of personal data to the territory of a foreign state to an authority of a foreign state, a foreign individual or a foreign legal entity;

2.12 Destruction of personal data – any actions, as a result of which personal data is permanently destroyed with the impossibility of further restoration of the content of personal data in the personal data information system and (or) as a result of which the material carriers of personal data are destroyed.

2.13 Operator – a state body, municipal body, legal entity or individual that independently or jointly with other persons organizes and / or performs the processing of personal data, as well as determines the purposes of processing personal data, the composition of personal data to be processed, actions (operations) performed with personal data.

3 The Operator may process the following personal data: The user

3.1 Last name, first name, patronymic;

3.2 Email address;

3.3 Phone numbers.

3.4 Also, on the website occurs the collection and processing of anonymous data about visitors (in t. h. file "cookie") from using the services of Internet statistics (Yandex Metric and Google Analytics and others).

3.5 The above -mentioned data is referred in the general concept of Personal Data throughout the Policy.

4 Purposes of personal data processing

4.1 The purpose of processing the User 's personal data is to inform. The user by sending emails.

4.2 The Operator also has the right to send notifications to the User about new special offers and services. The User can always opt out of receiving informational messages by sending an email to the Operator's email address sales@arfa-hotel.ru;

arfapakhotel@yandex.ru; reception@arfa- hotel.ru marked "Opt out of notifications about new products and services and special offers".

4.3 Depersonalized User data collected using Internet statistics services is used to collect information about User actions on the site, improve the quality of the site and its content.

5 Legal grounds for processing personal data

5.1 The Operator processes the User's personal data only if they are filled in and / or sent by the User independently through special forms located on the site https://arfa-hotel.ru. By filling out the relevant forms and / or sending their personal data to the Operator, the User agrees to this Policy.

5.2 The Operator also processes personal data for the purpose of concluding contracts between the Operator and the personal data subject.

5.3 The Operator processes depersonalized data about the User, if this is allowed in the User's browser settings (file saving is enabled
cookies and the use of JavaScript technology).

6 Procedure for collecting, storing, transmitting and other types of personal data processing

The security of personal data processed by the Operator is ensured by implementing legal, organizational and technical measures necessary to fully comply with the requirements of the current legislation in the field of personal data protection.

6.1 The Operator ensures the security of personal data and takes all possible measures that exclude access to personal data of unauthorized persons.

6.2 The User's personal data will never, under any circumstances, be transferred to third parties, except in cases related to the implementation of current legislation.

6.3 If inaccuracies in personal data are identified, the User can update them independently by sending a notification to the email address arfapakhotel@yandex.ru marked "Updating personal data".

6.4 The period of processing of personal data is unlimited. The User can withdraw their consent to the processing of personal data at any time by sending a notification to the Operator via email to the electronic address sales@arfa-hotel.ru; arfapakhotel@yandex.ru; reception@arfa- hotel.ru marked "Revocation of consent to the processing of personal data".

7 Cross-border transfer of personal data

7.1 Operator prior to the cross-border transfer of personal data

It is obliged to make sure, that the foreign state to whose territory it is intended to transfer personal data provides reliable protection of the rights of personal data subjects.

7.2 Cross-border transfer of personal data on the territory of foreign states that do not meet the above requirements can only be carried out if the personal data subject has written consent to the cross-border transfer of his personal data and/or the execution of a contract to which the personal data subject is a party.

8 Will concludethese terms and conditions

8.1 The User can get any clarifications on the issues of interest related to the processing of their personal data by contacting the Operator via e-mail sales@arfa-hotel.ru; arfapakhotel@yandex.ru; reception@arfa-hotel.ru.

8.2 This document will reflect any changes to the Operator's personal data processing policy. The policy is valid indefinitely until it is replaced with a new version.

8.3 The Operator has the right to make changes to this Policy without the consent of the Personal Data Subjects.

C Sincerely,
Arfa ParkHotel Administration