

«APPROVED»

LLC «Sunny House» Director

Hostel «KoikaGo»

_____ Karpov A.P.

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REGULATION

On processing and protection of client's personal data

1. General conditions

1.1. Following Regulation is subjected to the terms of the Constitution of the Russian Federation, Federal law «On information, informational technologies and information protection» №149-FZ dated 27/07/2006, Federal Law «On personal data» №152-FZ dated 27/07/2006 and other laws and regulations.

1.2. Main terms, used in Regulations:

- Organization – organization, providing hotel services to the client;
- Client – Private person, consumer of hotel services, owner of personal data
- Hotel services – actions of organization, focused on guest accommodation on the territory of hotel, as well as the other services, related to accommodation and living, including basic and additional services, provided to clients;
- Personal data – information, recorded in any form, related to private person (owner of personal data) which helps to identify Client
- Processing of personal data - actions with personal data, including receiving, systematization, storage, maintenance, refinement (updating and changing), using, transferring, anonymization, interlocking, destruction, and fetch protection of personal data, received from client.
- Transferring of personal data – actions, targeted to transferring of personal data to specific range of persons
- Using of personal data – actions with personal data, performed by Operator in order to take decision or taking any other actions, leading to legal consequences towards owner of the personal data or any other bodies, affected the rights and freedoms of the owner of the personal data or other bodies.
- Personal data confidentiality – binding for operator or any other person, received assess to personal data, not to pass received information without the consent of the owner of personal data or without any other legal foundation.

1.3. Following Regulation defines the order of client's personal data processing, for which Organization provides a whole range of accommodational services in the hostel.

1.4. The main goal of this Regulation is providing protection of clients' rights and freedoms, during the process of personal data processing.

1.5. Personal information is processing in order to execute the contract, according to which is provided accommodation facilities or temporary accommodation, one part of which is the Client. Organization collects information only to the extend, necessary for achieving mentioned goal.

1.6. Personal data cannot be used in order to cause material or moral damages to citizens, causing troubles to exercise the rights and freedoms of the Russian Federation citizens.

1.7. The current Regulation is signed by director and is binding for all employees, received assess to personal data

2. Content and receiving of client personal data

2.1. Personal data, collected and processed by Organization, include:

- Personal details (last name, first name, patronymic, date, month and year of birth, etc.)
- Document of identification, its number, information about date of issue and legal body, issued document
- address of registration
- residence address
- contact telephone number
- contact e-mail address

2.2. All personal data the Organization employees receive from the owner of the personal data – from the Client.

3. Processing and storage of Clients' personal data

3.1. Personal data processing, made by Organization, consists of receiving, systematization, storage, maintenance, refinement (updating and changing), using, transferring, anonymization, interlocking, destruction, and fetch protection of personal data, received from client.

3.2. Personal data processing is made in order to perform the goals of concluded contract, one part of which is the owner of the personal data – Client.

3.3. Clients' personal data processing is made by mixed method of analyzing.

3.4. The access to this information has authorized employees, working in Organization and signed the Confidentiality Agreement only.

3.5. The list of employees, working in Organization, and having access to this information is limited according to the Order, issued by Director.

3.6. Clients' personal data, registered on hard copy, is stored at reception desk.

3.7. Clients' personal data, registered at electronic storage devices, is stored at Organization local computer net, electronic folders and files at Director PC and PCs of employees, enlisted to have access to this information and process of processing.

4. Consumption and transferring of Clients' personal data

4.1. Organization use Clients' personal data for achieving goals, specified in the Contract, concluded between Organization and the Guest only, particularly for providing accommodation services, as well as the other additional services.

4.2. During Client's personal data transfecting, Organization ought to keep the following requirements:

4.2.1. Aware the bodies, receiving Clients' personal data, that this information can be used only to the purpose, they are disclosed for, and ask for written acceptance of this regulation implementation. Bodies, received clients' personal data, ought to keep all received information confidential. This mode of confidentiality is not valid during the process of anonymization of personal data and for information, public data.

4.2.2. To give access to clients' personal data to authorized employees only, and at the same time, the list of these employees ought to have the right to receive only that part of personal data, necessary for accomplishing of the certain functions

4.2.3. In case of trans-border transfer of personal data, organization should make sure, that foreign entity, on which territory is performed the personal data transferring, has the adequate protection for the rights of personal data owner.

4.2.4. Trans-border transfer of personal data to the territories of foreign entities, which don't provide adequate protection for the rights of personal data owner can be made in the following cases:

- if the written consent is given by Client;
- Preappointed by international agreements of the Russian Federation regarding issuing visas, international agreements of Russian Federation on rendering legal assistance for civil, domesticity and criminal cases, as well as international agreement of the Russian Federation upon readmission.
- Provided for by the federal laws, if it's required in case of protection the foundations of the constitutional system of the Russian Federation, defense support and security of the State.
- Performance the contract, one part of which is the owner of personal data.
- Protection of life, health, other vital interests of the personal data owner or other bodies, in case if it's impossible to receive written contest from the owner of the personal data.

4.3. It's strictly forbidden to answer questions, connected with transferring of information, containing personal data, by phone or fax.

4.4. Organization has the right to provide or pass personal data of the Client to third party in the following cases:

- If disclosure of this information is required for compliance with the laws, accomplishment of court decree;
- For providing of assistance in carrying out an investigation, performed by law enforcement body or any other bodies;
- For protection of Client and Organization legal rights;

5. Unauthorized access protection of Clients' personal data

5.1. During the process of clients' personal data processing, Organization should take all organizational and technical measures for providing unauthorized access protection of personal data, to prevent its abolishment, adjustment, blocking, coping, distribution of personal data, as well as other illegal actions

5.2. For effective protection of clients' personal data, it's necessary to make the following actions:

5.2.1. Keep the procedure of receiving, keeping and storing of client's personal data.

5.2.2. Use all technical means of guardianship and signalization;

5.2.3. To conclude with all employees, having the right to receive, proceed and protect clients' personal data, non-disclosure Agreement

5.2.4. Take disciplinary action against employees, guilty in violation of norms and standards of receiving, processing and protection of clients' personal information.

5.3. Access to clients' personal data of Organization employees, who are not specified in list of employees, allowed to work with this information, is strictly prohibited.

5.4. Documents, containing clients' personal data, stored at reception area, where its unauthorized access protection is provided.

5.5. Protection of electronic data base access, containing clients' personal data, is provided by:

- Using licensed program products, preventing unauthorized access of third parties to client's personal data
- Password system. Passwords are set by Director and presented to employees, having access to personal data processing, individually.

5.6. Making copy and notes from client's personal data is allowed in business purposes only, and after receiving written consent from Director.

6. Organization obligations

6.1. Organization is obliged to:

6.1.1. Perform clients' personal data processing in order to provide legal services to clients only.

6.1.2. To receive clients' personal data straightforwardly from guest. If it's possible to receive clients' personal data from third party only, the Client should be informed about it beforehand and the Organization should receive written consent. Organization employees should inform Client the main goals, planned sources and methods of client's personal data receiving. As well as about character of received information, and further client's refusal to provide written consent for processing of received information.

6.1.3. Not to receive and not to proceed client's personal data, concerning his/her entity, national identity, political opinion, religion or philosophic opinion, health condition, intimate life, excluding cases, prescribed by law.

6.1.4. To give access to clients' personal data or to his representative in law at request or at the moment of receiving information, containing number of the clients' or third party basic identification document, information about date of issuing this document, body, issued this document, and signature of Client or its representative in law. Request can be sent in electronic form and signed by digital signature according to Russian Federation regulation. Information about personal data should be presented to Client in an intelligible form and they should not contain personal data, connected with the other owners of personal data.

6.1.5. Abridge a right of the Client to have access to his personal information in case if:

- 1) Personal data processing, as well as personal information, received in the result of operational investigations, counterintelligence and intelligence activities, performed in order of country defense and law enforcement.
- 2) Personal data processing is performed by bodies, arrested the owner of personal information, on suspicion of having committed crime or accused of criminal case, or put under restraint, before pre-arrestment is made, except for cases, provided by criminal procedure legislation of the Russian Federation. And in cases if familiarization of suspect or accused person is allowed.
- 3) Providing of personal data violates constitutional rights and liberties of the other bodies.

6.1.6. Providing storage and protection of Client's personal data, against unlawful use or loss.

6.1.7. In case of discovering incorrect personal data, submitted for processing, or illegal actions of with them, performed by operator, after request of the owner of the personal data, or its legal representative, or authorized official body, specialized in protection of rights of personal data owners, operator is obliged to block personal information, connected with certain owner, since moment of such request and after receiving such request for the period of checking.

6.1.8. In case if the fact of data corruption is approved, operator on the base of documents, submitted by the owner of the personal information, or by its legal representative, or authorized body, specialized in protection of rights of personal data owners or other required documents, is obliged to specify data and release a lock.

6.1.9. In case if the data illegal acts is approved, operator should within a period not exceed three working days, since the date of finding this illegal act, ought to rectify this violation. In case if this rectification is impossible, operator should destroy personal data within the period, not exceed three working days since the moment of finding this illegal acts. Operator ought to inform the owner of the personal data about rectification or destroying personal data, or its legal representative, and in case if application or request were sent by authorized body, specialized in protection of owner personal information, as well as specified body.

7. Client's rights

7.1. Client has the right to:

- Access to information about himself, as well containing information, approving fact of personal information processing, and reason for this processing and methods of information processing, used by organization, information about employees, having access to personal data or list of these employees, might get this access; list of personal information, required for processing and its source, terms of personal data processing, as well as terms of storage; information about which legal consequences for Client may cause personal data processing;
- Determination of forms and methods of personal data processing;
- Setting limits for methods and forms of personal information processing;
- Ban for further transferring of personal data without consent of its owner;
- Changing, specification, destruction of information about himself;
- Appeal against unlawful actions or failure to process personal data, and further compensation, by judicial procedure;

8. Client's personal data confidentiality

8.1. Information about Client's personal data is confidential

8.2. Organization provides personal information confidentiality and ought not to allow its further transfer to third parties without Client consent, or in case of any other legal foundation.

8.3. Bodies, having access to personal body information, ought to keep regime of confidentiality, should be warned about necessity to keep security order. Taking into consideration personal information confidentiality regime, this information should provide appropriate security measures for protecting of data against accidental or non-authorized destruction, against accidental loss, non-authorized access, changing or transferring.

8.4. All measures of confidentiality during process of collecting, processing and storing of clients' personal data are valid for all types of storage devices, as hard copies, so automated ones.

8.5. Personal data confidentiality regime will be deactivated in case of depersonalization or including them to public sources of personal data, unless otherwise is determined by law.

9. Responsibility for violation of norms, controlling clients' personal data processing

9.1. Organization is responsible for personal information, which they have in their disposal, and assigns personal responsibility of each employee for keeping confidentiality regime set by Director.

9.2. Each employee, receiving documents for work, which contains client's personal information, becomes ultimately responsible for safety of informational source and information confidentiality.

9.3. Anyone can refer to Organization employee and report about violation of any of these regulations. Reports and Claims about compliance with the requirements for personal data processing are considered within three days since the day of its receiving.

9.4. Organization employees are ought to provide consideration of received inquiry, applications and pleas of clients, as well as to provide maximum assistance for satisfying of the requirements, received from relevant authorities.

9.5. Employees, guilty of a norm violation, responsible for receiving, processing and protection of clients' personal data, are subjected to disciplinary, administrative, civil legal or prosecution liability according to federal laws.

10. Client's personal data destruction

10.1. After receiving the goal of personal data processing, Organization ought to stop processing of clients' personal data and destroy clients' personal data.

10.2. Clients' personal data, stored in hard copy variant as well as at soft copy variant, stored during period of one year since the date of receiving, and afterwards, destroyed according to destruction statement within the following terms:

- Stored in hard copies and not categorized as accounting source documents or other documents, entitled for storage according to the Russian Federation Legislation, destroyed within thirty days since the period of storage is expired.

- Stored in hard copies and categorized as accounting source documents or other documents, entitled for storage according to the Russian Federation Legislation, destroyed within thirty days since the period of storage is expired.

10.3. Processing of personal data, stored on electronic data storage device, is stopped, and personal data itself is destroyed within thirty days since the period of storage is expired.

11. Procedure of implementation and changing of Regulations

11.1. Given Regulations are coming into force since the moment of approving by the Director of Organization and remains in force without limit of time, until the moment of its replacement by new Regulations.

11.2. All changes are added to the following Regulations on the basis of Orders of Organization Director.