Privacy Policy for Personal Data (hereinafter referred to as the Privacy Policy) applies to all information that the Internet resource of LLC "Grindorf," located at the domain name https://greengatehotel.ru, may receive about the User during the use of the website of the Internet resource, programs, and products of the Internet resource.

## 1. DEFINITIONS

- 1.1. The following terms are used in this Privacy Policy:
- 1.1.1. "Website Administration of the Internet Resource" (hereinafter Website Administration) authorized employees responsible for managing the website, acting on behalf of LLC "Grindorf," who organize and/or carry out the processing of personal data, as well as determine the purposes of personal data processing, the composition of personal data subject to processing, and actions (operations) performed with personal data.
- 1.1.2. "Personal Data" any information relating directly or indirectly to an identified or identifiable individual (personal data subject).
- 1.1.3. "Processing of Personal Data" any action (operation) or 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), retrieval, use, transfer (distribution, provision, access), anonymization, blocking, deletion, destruction of personal data.
- 1.1.4. "Confidentiality of Personal Data" a mandatory requirement for the Operator or any other person who has gained access to personal data not to allow its disclosure without the consent of the personal data subject or other legal grounds.
- 1.1.5. "User of the Website Internet Resource" (hereinafter User) a person who has access to the Website via the Internet and uses the Website of the Internet resource.
- 1.1.6. "Cookies" a small piece of data sent by a web server and stored on the user's computer, which the web client or web browser sends back to the web server each time it attempts to open a page of the corresponding site in an HTTP request.
- 1.1.7. "IP Address" a unique network address of a node in a computer network built using the IP protocol.

# 2. GENERAL PROVISIONS

- 2.1. The User's use of the Website Internet resource signifies their consent to this Privacy Policy and the terms of personal data processing.
- 2.2. If the User disagrees with the terms of the Privacy Policy, they must stop using the Website Internet resource.
- 2.3. This Privacy Policy applies only to the website of the Internet resource of LLC "Grindorf." The Internet resource does not control and is not responsible for third-party websites that the User may access via links available on the Internet resource website.
- 2.4. The Website Administration does not verify the accuracy of the personal data provided by the User of the Website Internet resource.

## 3. SUBJECT OF THE PRIVACY POLICY

- 3.1. This Privacy Policy establishes the obligations of the Website Administration of the Internet resource to maintain confidentiality and ensure the protection of personal data.
- 3.2. Personal data authorized for processing within the framework of this Privacy Policy are provided by the User by filling out the registration form on the Website of the Internet resource. The section title includes the following information:
- 3.2.1. User's name;
- 3.2.2. User's contact phone number.
- 3.3. The Internet resource protects data that is automatically transmitted during the viewing of advertising blocks and when visiting pages where a statistical system script is installed, including:
- IP address;
- Information from cookies;
- Information about the browser (or other software used to access the advertisement);
- Access time;
- Address of the page where the advertising block is located;
- Referrer (address of the previous page).
- 3.3.1. Disabling cookies may result in the inability to access parts of the Internet resource's website that require authorization.
- 3.3.2. The Internet resource collects statistics about the IP addresses of its visitors. This information is used to detect and resolve technical issues and to monitor the legality of financial transactions.
- 3.4. Any other personal information not specified above (purchase history, browsers and operating systems used, etc.) is subject to secure storage and non-disclosure, except in cases provided for in clauses 5.2 and 5.3 of this Privacy Policy.
- 4. PURPOSES OF COLLECTING USER'S PERSONAL INFORMATION
- 4.1. The Website Administration of the Internet resource may use the User's personal data for the following purposes:
- 4.1.1. Establishing feedback with the User, including sending notifications, inquiries related to the use of the Website Internet resource, provision of services, processing requests and applications from the User.
- 4.1.2. Determining the User's location to ensure security and prevent fraud.
- 4.1.3. Verifying the accuracy and completeness of the personal data provided by the User.
- 4.1.4. Providing the User with effective customer and technical support in case of issues related to the use of the Website Internet resource.

- 4.1.5. Providing the User, with their consent, with product updates, special offers, pricing information, newsletters, and other information on behalf of the Internet resource or its partners.
- 4.1.6. Conducting advertising activities with the User's consent.
- 4.1.7. Granting the User access to the websites or services of the Internet resource's partners for the purpose of receiving products, updates, and services.

# 5. METHODS AND PERIODS OF PERSONAL INFORMATION PROCESSING

- 5.1. The processing of the User's personal data is carried out without limitation of time, by any lawful means, including in personal data information systems using automation tools or without using such tools.
- 5.2. The User agrees that the Website Administration has the right to transfer personal data to third parties, in particular courier services, postal organizations, telecommunications operators, solely for the purpose of fulfilling the User's order placed on the Website Internet resource of LLC "Grindorf," including the delivery of goods.
- 5.3. The User's personal data may be transferred to authorized government authorities of the Russian Federation only on the grounds and in the manner established by the legislation of the Russian Federation.
- 5.4. In case of loss or disclosure of personal data, the Website Administration shall inform the User about the loss or disclosure of personal data.
- 5.5. The Website Administration takes necessary organizational and technical measures to protect the User's personal information from unauthorized or accidental access, destruction, alteration, blocking, copying, distribution, as well as from other unlawful actions of third parties.
- 5.6. The Website Administration together with the User takes all necessary measures to prevent losses or other negative consequences caused by the loss or disclosure of the User's personal data.
- 6. OBLIGATIONS OF THE PARTIES
- 6.1. The User is obliged to:
- 6.1.1. Provide information about personal data necessary for using the Website of the Internet resource.
- 6.1.2. Update and supplement the provided personal data information in case of any changes.
- 6.2. The Website Administration is obliged to:
- 6.2.1. Use the received information exclusively for the purposes specified in clause 4 of this Privacy Policy.
- 6.2.2. Ensure the confidentiality of information, not disclose it without the prior written consent of the User, and not sell, exchange, publish, or disclose the User's personal data in any other way, except as provided in clauses 5.2 and 5.3 of this Privacy Policy.

- 6.2.3. Take precautionary measures to protect the confidentiality of the User's personal data in accordance with the procedures commonly used for protecting such information in the existing business turnover.
- 6.2.4. Block the personal data related to the corresponding User from the moment of the User's or their legal representative's or authorized data protection authority's request during the period of verification in case of detection of inaccurate personal data or unlawful actions.

#### 7. LIABILITY OF THE PARTIES

- 7.1. The Website Administration that fails to fulfill its obligations is liable for damages incurred by the User due to unlawful use of personal data, in accordance with the legislation of the Russian Federation, except for cases provided in clauses 5.2, 5.3, and 7.2 of this Privacy Policy.
- 7.2. In case of loss or disclosure of confidential information, the Website Administration is not liable if such confidential information:
- 7.2.1. Became publicly available before its loss or disclosure;
- 7.2.2. Was received from a third party before being received by the Website Administration;
- 7.2.3. Was disclosed with the User's consent.

## 8. DISPUTE RESOLUTION

- 8.1. Before filing a lawsuit regarding disputes arising between the User of the Website Internet resource and the Website Administration, it is mandatory to submit a claim (written proposal for voluntary dispute resolution).
- 8.2. The recipient of the claim shall notify the claimant in writing of the results of the claim review within 30 calendar days from the date of receipt of the claim.
- 8.3. If an agreement is not reached, the dispute will be referred to the judicial authority in accordance with the current legislation of the Russian Federation.
- 8.4. This Privacy Policy and relations between the User and the Website Administration are governed by the applicable legislation of the Russian Federation.

### 9. ADDITIONAL TERMS

- 9.1. The Website Administration reserves the right to make changes to this Privacy Policy without the User's consent.
- 9.2. The new Privacy Policy comes into effect from the moment it is posted on the Website of the Internet resource, unless otherwise provided by the new version of the Privacy Policy.
- 9.3. All suggestions or questions regarding this Privacy Policy should be sent to info@greengatehotel.ru.
- 9.4. The current Privacy Policy is posted on the page at https://greengatehotel.ru/legal-information/.