



VENICE HOTEL

*Встречаем с теплотой  
и гостеприимством*

## ***Venice Hotel Policy in Personal Data Processing***

The present Policy is conducted by Venice Hotel Limited (hereinafter referred to as the Company) in regard to personal data of physical entities to comply with Federal Law No. 152-ФЗ "On personal data" dated 27 July 2006 with the legal base for processing in Article 24 of Russian Constitution, Chapter 14 of the Labor Code of the Russian Federation, Decree of Russian Government No. 687 "Approval to regulate particular aspects of personal data non-automatically processed" dated 15 September 2008 and the Civil Code of the Russian Federation.

This Policy is applied to all personal data received by the Company in carrying out its business activities. It stipulates the procedure of procession, obtaining, collection, systematization, accumulation, storage, specification, update, modification, usage and record of personal data. It provides protection of individual rights and freedoms in processing their personal data with or without the use of information systems, as well as states the responsibility of those having access to personal data for failure to comply with the requirements regulating procession and protection of personal data.

The Policy is implemented in the following Company's internal regulating and ordering documents:

Provision on personal data of physical entities established that stipulates the procedure to collect, process, store and transfer the personal data, rules to access to personal data and protect it;

Orders issued that approve the list of persons granted access to individual entities personal data processed in information systems or without the use of information systems;

Orders issued that stipulate people responsible for collection and storage of personal data;

List of measures to ensure the personal data is secured and the order of damage assessment if the legislation on personal data protection is violated are established.

In accordance with the requirements of Article 18.1 of Federal Law No. 152-ФЗ "On personal data" of 27 July 2006 the Company grants unlimited access to this Policy except for internal legal documents. In order to ensure the personal data is secured, in accordance with the requirements of Article 19 of Federal Law No. 152-ФЗ and Chapter 14 of the Labor Code, the Company limits access to internal legal documents to authorized Company's employees and to government authorities entitled to monitor the personal data protection legislation is observed.