

## Privacy policy

### I. General provisions

These Privacy Policy Provisions (hereinafter referred to as the Provisions) are an official document of IE Kratov DV. (hereinafter referred to as "Company" / "Operator"), and determines the procedure for processing and protecting information about individuals and individual entrepreneurs (hereinafter referred to as "Users") using services, information, services, programs (including loyalty programs) and the products of the Internet resource located on the domain name <https://bookinglite.ru/> (hereinafter referred to as the Site).

Observance of confidentiality is important for the Company, because the purpose of this Privacy Policy is to protect the rights and freedoms of a person and citizen while processing their personal data, including the protection of privacy, personal and family secrets, from unauthorized access and disclosure.

We have developed a Privacy Policy, which describes how we carry out the processing of personal data - any actions (operations) or a set of actions (operations) performed with the use of automation tools or without the use of such tools with personal data, including the collection, recording, systematization, accumulation, storage, clarification (update, change), retrieval, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data.

Relationships related to the processing of personal data and information about users of the Site are governed by these Regulations, other official documents of the Operator and the current legislation of the Russian Federation

We process personal data on a lawful and fair basis, acting reasonably and in good faith and based on the principles:

- the legality of the purposes and methods of processing personal data;
- good faith;
- the compliance of the purposes of the processing of personal data with the goals predetermined and declared when collecting personal data, as well as the powers of the Company;
- correspondence of the volume and nature of the personal data being processed, the methods of personal data processing to the purposes of personal data processing.

This Privacy Policy governs any type of processing of personal data and personal information (any information that can be used to establish identity and any other information related to it) about individuals, legal entities, individual entrepreneurs who are consumers of the products or services of the Company and applies to processing of personal, personal data collected by any

means, both active and passive, both through the Internet and without its use, from persons in anywhere in the world.

## **II. Collection of personal data**

The purpose of processing personal data is to fulfill the obligations of the Operator towards the Users in relation to the use of the Site and its services.

The processing of personal data of users is carried out only with the consent of the subject of personal data to the processing of his personal data.

By personal data is meant any information relating to directly or indirectly determined or determined by the User (the subject of personal data) and which can be used to identify a specific person or to communicate with him.

We may request personal information from you at any time when you contact the Company. The company may use such data in accordance with this Privacy Policy. It can also combine such information with other information for the purpose of providing and improving its products, services, content (content) and communications.

Below are some examples of the types of personal data that the Company may collect, and how we may use such information.

### WHAT PERSONAL DATA WE COLLECT

We may collect various data / information, including:

- First name, surname, patronymic;
- date of birth;
- gender, marital status;
- mailing address;
- phone number;
- information about selected contacts;
- E-mail address;
- the address of the site / blog / page on social networks;
- information on the address of residence / location;
- information on the systems and services used;

—The new information that the law relates to the personal data of an individual.

Personal data may also include those additionally provided by the Users at the Operator's request in order for the Operator to fulfill its obligations to the Users arising from the service agreement. The Operator has the right, in particular, to request from the User a copy of an identity document, or another document containing the name, surname, photograph of the User, as well as other additional data that, at the discretion of the Operator, will be necessary and sufficient to identify such User and allow to exclude abuses and violations of the rights of

third parties (and in the event that the User is a legal entity - scans / copies of statutory documents).

When you bring other Users to our events and activities or invite them to communicate with us, the Company may collect personal data you provide about these Users (for example, such as: name, surname, date of birth, postal address, email address and telephone number etc.).

When processing personal data, we ensure the accuracy of personal data, their sufficiency, and, if necessary, relevance in relation to the purposes of processing personal data.

### **III. Storage and use of personal data**

Users' personal data is stored exclusively on electronic media and processed using automated systems, except when manual processing of personal data is necessary in connection with the fulfillment of legal requirements.

#### **HOW WE USE YOUR PERSONAL INFORMATION**

The personal data we collect allow you to send you notifications about new products, special offers and various events. They also help us improve our services, content and communications. If you do not wish to be included in our mailing list, you can at any time unsubscribe from the list by informing us on the specified contacts for feedback, as well as making changes to your profile settings on the site.

From time to time, we may use your personal data to send important notices containing information about changes to our terms, conditions and policies, as well as confirming your orders and purchases made. Since such information is important for your relationship with the Company, you cannot refuse to receive such messages.

We may also use personal information for internal purposes, such as: conducting audits, analyzing data and various studies in order to improve the Company's products and services, as well as interacting with intermediaries and consumers.

If you participate in a prize draw, competition, or similar promotional event, we reserve the right to use the personal data you provide to manage such programs.

#### **COLLECTION AND USE OF INFORMATION NOT PERSONAL**

We also collect personal data that is not personal — data that does not allow us to directly associate it with any particular person. We may collect, use, transfer and disclose information that is not personalized for any purpose. The following are examples of non-personal information we collect and how we can use it:

- used CMS and / or CRM systems;
- other information

We may collect personal information such as: occupation, language, postal code, unique device identifier, location and time zone in which a product is used, in order to better understand consumer behavior and improve our products, services and communications.

We may also collect personal data / information about what the user is interested in on our website when using our other products and services. Such personal data / information is

collected and used to help us provide more useful information to our customers and to understand which elements of our site, products and services are most interesting. For the purposes of this Privacy Policy, aggregate data are treated as non-personal data / information.

If we combine non-personal information with personal information, such aggregate information will be treated as personal information as long as such information is combined.

#### **IV. Transmission of personal data**

The processing of the User's personal data is carried out without any time limit, in any legal way, including in personal data information systems using automation tools or without using such tools

The user agrees that the Operator is entitled to transfer personal data to third parties, in particular, courier services, postal organizations, telecommunications operators, etc., solely for the purposes specified in the section "Personal Data Collection" of this Privacy Policy

When specifying a user or with the user's consent, it is possible to transfer User's personal data to third parties who are counterparties of the Operator on the condition that such counterparties assume obligations to ensure the confidentiality of the information received, in particular when using applications.

User's personal data may be transferred at the request of the authorized bodies of state power of the Russian Federation only on the grounds and in the manner established by the legislation of the Russian Federation.

The Operator blocks personal data related to the relevant User from the moment of the request or request of the User or his legal representative or authorized body for the protection of the rights of personal data subjects for the period of verification, in case of unreliable personal data or illegal actions.

#### **DISCLOSURE OF INFORMATION TO THIRD PARTIES**

In some cases, the Company may provide certain personal information and data to strategic partners who work with the Company to provide products and services, or those that help the Company to sell products and services to consumers. We provide third parties with the minimum amount of personal data required only to provide the required service or conduct the necessary transaction.

Personal information will be provided by the Company only in order to provide consumers with products and services, as well as to improve these products and services related to their communications.

To use your personal data for any other purpose, we will request your consent to the processing of your personal data.

#### **SERVICE PROVIDERS**

The company provides personal data / information to Companies that provide such services as: processing information, fulfilling customer orders, other types of customer service, determining your interest in our products and services, conducting surveys aimed at studying our customers or satisfying the quality of service. Such companies undertake to protect your information regardless of the country of their location.

#### OTHER PERSONS

A company may need to disclose your personal data in accordance with the law, a court order, in a court proceeding and / or on the basis of public inquiries or requests from state authorities in or outside the territory of your country of residence. We may also disclose personal data / information about you if we determine that such disclosure is necessary or appropriate for national security, law enforcement or other socially important purposes.

We may also disclose personal data / information about you if we determine that disclosure is necessary to enforce our terms and conditions or to protect our business and our users. Additionally, in the event of a reorganization, merger or sale, we may transfer any or all of the personal information we collect to a relevant third party.

#### **V. Destruction of personal data**

User's personal data is destroyed when:

- deletion by the Operator of the information posted by the User, as well as the personal page of the User in the cases established by the contract (offer);
- upon the withdrawal by the subject of personal data of consent to the processing of personal data.

#### IDENTIFICATION FILES (COOKIES) AND OTHER TECHNOLOGIES

Website, interactive services and applications, emails and any other communications on behalf of the Company may use identification cookies and other technologies, such as: pixel tags, web beacons. Such technologies help us better understand the behavior of users, tell us which sections of our site have been visited by users, and measure the effectiveness of advertising and network searches. We consider information collected by cookies and other technologies as non-personal information.

Our goal in such cases is to provide a more convenient and personal interaction with the Company. For example, knowing your name, we can use it in our communications. Knowing that someone, using your computer or device, has purchased a certain product or used a certain service, we can ensure that your interests of advertising messages and e-mail are more in line with your interests. In the end, all this knowledge helps us to provide you with the highest quality service.

If you can disable cookies in the settings of your web browser or mobile device. Please note that some features of the website may become inaccessible after disabling cookies.

As with most websites, we collect some information automatically and store it in statistics files. Such information includes the Internet Protocol (IP) address, browser type and language, information about the Internet service provider, referring and exit pages, information about the operating system, date and time stamp, and information about the visits. We use this information to understand and analyze trends, administer the site, study user behavior on the site, and collect demographic information about our main contingent of users in general. A company may use such information for its marketing purposes.

In some of our emails we use interactive links to information posted on the Company's website. When users follow such links, before they get to the destination page on our website, their requests are registered separately. We monitor such "pass-through" data in order to help us determine interest in particular topics and measure the effectiveness of our communication with consumers. If you prefer that your messages are not tracked in this way, you should not follow text or graphic links in e-mail messages.

Pixel tags allow us to send emails in a format that is readable by consumers, and tell us whether such messages have been read. We may use such information to limit the number of messages sent to consumers or to stop sending them.

## **VI. Protection of personal information**

The company takes precautions - including legal, organizational, administrative, technical and physical - to ensure the protection of your personal data in accordance with Art. 19 of the Federal Law of 27.07.2006 N 152-ФЗ "On Personal Data" in order to ensure the protection of personal data of the User from unauthorized or accidental access to them, destruction, modification, blocking, copying, distribution, as well as from other illegal actions of third parties.

When you use some products, services or applications of the Company or post entries on forums, in chat rooms or social networks, the personal data you provide are visible to other users and can be read, collected or used by them. You are responsible for the personal data you prefer to provide in such cases on your own. For example, if you enter your name and email address in a forum post, such information is public. Please take precautions when using these features.

### **INTEGRITY AND PRESERVATION OF PERSONAL INFORMATION**

Interacting with the Company, you can easily keep your personal data and information up to date. We will retain your personal data and information for the period necessary to fulfill the objectives described in this Privacy Policy, unless a longer period for storing data and information is required by law or permitted by it.

We do not collect personal information about minors. If we become aware that we have received personal information about a minor, we will take steps to remove such information as soon as possible.

We strongly recommend that parents and other persons under whose supervision are minors (legal representatives - parents, adoptive parents or guardians), monitor the use of websites by minors.

#### THIRD PARTY SITES AND SERVICES

Company websites, products, applications, and services may contain links to third-party websites, products, and services. Our products and services may also use or offer products or services from third parties. Personal data and information collected by third parties, which may include such information as location data or contact information, is governed by the privacy policies of such third parties. We encourage you to learn the privacy practices of such third parties.

The Operator is not responsible for the actions of third parties who obtained access to information about the User as a result of using the Internet or the Website Services and for the consequences of using data and information that, due to the nature of the Website, are available to any Internet user.

#### COMPLIANCE WITH YOUR PRIVACY AT THE COMPANY LEVEL

In order to make sure that your personal data is safe, we communicate confidentiality and security standards to the Company's employees and strictly monitor the implementation of confidentiality measures within the Company.

#### QUESTIONS ABOUT CONFIDENTIALITY

If you have any questions regarding the Company's Privacy Policy or the processing of data by the Company, you can contact us at the contacts listed on the Site.

### **VII. User requests**

The current legislation of the Russian Federation applies to this Privacy Policy and the relationship between the User and the Operator.

Users have the right to send their requests to the Operator, including requests regarding the use of their personal data, sending revocation of consent to the processing of personal data in writing to the address specified in the General Conditions of this provision, or in the form of an electronic document signed by a qualified electronic signature in accordance with legislation of the Russian Federation, and sent through the feedback form the official website of the Company.

The request sent by the User must comply with the requirements established by the Rules for Submission of Applications to the Service and Support Service, in particular, contain:

- E-mail address;

- contact number.

The operator undertakes to consider and send an answer to the received User request within 30 days from the receipt of the application.

#### OTHER

In all other respects that are not directly reflected in the Privacy Policy, the Company undertakes to be guided by the norms and provisions of the Federal Law dated July 27, 2006 N 152-Φ3 "On Personal Data"

A visitor to the Company's website who provides personal data and information, thereby agrees to the provisions of this Privacy Policy.

The Company reserves the right to make any changes to the Policy at any time at its discretion in order to further improve the system of protection against unauthorized access to the personal data reported by Users without the consent of the User. When we make significant changes to our Privacy Policy, our website posts a corresponding notice along with an updated version of the Privacy Policy.

This Policy does not apply to actions and Internet resources of third parties.