

CONFIDENTIALITY POLICY

1. GENERAL PROVISIONS

1.1. This Policy of Autonomous Non-Profit Organization Project Office for Moscow Tourism and Hospitality Development (Confidentiality Policy) (address: 7/5 B. Dmitrovka Street, building 1, floor 5, Tverskoy Municipal District intracity municipal unit, Moscow, 125009, tel. + 7 (495) 957-96-77, e-mail address: info@welcome.moscow, OGRN 1187700020947, INN 7703468243, KPP 771001001) regarding personal data processing (hereinafter—the Policy) was developed in pursuance of requirements of cl. 2, part 1, art. 18.1 of Federal Law No. 152-FZ On Personal Data dated 27/07/2006 (hereinafter—the Law on Personal Data) to ensure protection of human and civil rights and freedoms when processing their personal data, including protection of the rights to privacy, personal and family secrets.

1.2. The Policy applies to all personal data processed by ANO Moscow Tourism and Hospitality Development Project Office (hereinafter—the Operator, Organization).

1.3. The Policy specifies the basic rights and obligations of the Operator and Personal Data Subjects, purposes of personal data processing, legal grounds for personal data processing, categories of personal data processed, categories of Personal Data Subjects, procedure and conditions for personal data processing, and measures to ensure personal data security during their processing used by the Organization.

1.4. The Policy applies to relations in personal data processing arising at the Operator both before and after approval of the Policy.

1.5. The Policy and amendments thereto shall be approved by the General Director of the Organization or their deputy.

1.6. Pursuant to requirements of part 2, art. 18.1 of the Law on Personal Data, the Policy shall be published in free access on the Operator's Internet website.

1.7. Control over compliance with the Policy requirements is implemented by the authorized persons in charge of organizing personal data processing in the Operator's premises.

1.8. Liability for violation of requirements of legislation of the Russian Federation and the Operator's regulatory acts in personal data processing and protection shall be determined according to legislation of the Russian Federation.

1.9. Basic Terms and Definitions

Personal data means any information directly or indirectly related to a specific or identifiable individual (Personal Data Subject). Personal Data Operator (Operator) means a state body, municipal authority, legal entity or individual, independently or jointly with other persons organizing and/or processing personal data, and determining the purposes of personal data processing, composition of personal data to be processed, actions (operations) performed with

personal data. Personal data processing means any action (operation) or series of actions (operations) with personal data performed using automation tools or without them. The personal data processing includes, among other things:

- collection;
- recording;
- systematization;
- accumulation;
- storage;
- clarification (update, change);
- retrieval;
- usage;
- transfer (distribution, provision, and access);
- depersonalization;
- blocking;
- removal;
- destruction.

Automated personal data processing means processing of personal data using computer technology.

Personal data dissemination means actions aimed at personal data disclosure to the public.

Providing personal data means actions aimed at personal data disclosure to a certain person or certain group of persons.

Personal data blocking means temporary termination of personal data processing (except in cases where processing is required to clarify personal data).

Personal data destruction means actions making restoration of the personal data content in the personal data information system impossible and/or resulting in destruction of material carriers with personal data.

Personal data depersonalization means actions resulting in the impossibility to determine the identity of personal data with regard to a specific Personal Data Subject without use of additional information.

Personal data information system means a set of personal data contained in databases and information technologies and technical tools that ensure its processing.

Transborder transfer of personal data means the transfer of personal data to an authority of a foreign state, foreign individual or foreign legal entity in the territory of a foreign state.

1.10. Operator's Basic Rights and Obligations

1.10.1. The Operator may:

- independently specify the composition and list of measures necessary and sufficient to ensure fulfillment of obligations stipulated by the Law on Personal Data and regulatory legal acts adopted in accordance therewith, unless otherwise stipulated by the Law on Personal Data or other federal laws;
- entrust personal data processing to another person with the Personal Data Subject's consent, unless otherwise stipulated by federal law, based on the contract concluded with such person. The person processing personal data on behalf of the Operator shall respect the personal data processing principles and rules stipulated by the Law on Personal Data;
- in case of withdrawal of the Personal Data Subject's consent to process personal data, the Operator may continue processing personal data without the Personal Data Subject's consent subject to grounds specified in the Law on Personal Data.

1.10.2. The Operator shall:

- organize personal data processing according to requirements of the Law on Personal Data;
- respond to inquiries and requests of the Personal Data Subjects and their legal representatives according to requirements of the Law on Personal Data;
- provide the authorized body in charge of protection of the rights of Personal Data Subjects (Federal Service for Supervision of Communications, Information Technology and Mass Communications (Roskomnadzor)) with necessary information at its request within 30 (thirty) calendar days from the date of receipt of such a request.

1.11. Basic rights of the Personal Data Subject

1.11.1. The Personal Data Subject may:

- receive information related to processing of its personal data, except in cases stipulated by federal laws. The Operator shall provide the Personal Data Subject with information in the accessible form, and it shall not contain personal data related to other Personal Data Subjects, except when there are legitimate grounds for disclosure of such personal data. The list of information and procedure for obtaining it is established by the Law on Personal Data;
- require the Operator to clarify its personal data, block or destroy it if the personal data is incomplete, outdated, inaccurate, illegally obtained, or is not necessary for the stated purpose of processing, as well as take measures stipulated by law to protect its rights;
- put forward the condition of prior consent when processing personal data to promote goods, works and services on the market;
- appeal to Roskomnadzor or in court against the Operator's illegal actions or omission when processing its personal data.

2. PURPOSE OF PERSONAL DATA COLLECTION

2.1. The personal data processing is limited to achievement of specific, predetermined and legitimate goals. Processing of personal data incompatible with the purposes of personal data collection is prohibited.

2.2. Only personal data that meets the purposes of its processing is subject to processing.

2.3. Personal data shall be processed by the Operator for the following purposes:

- ensuring compliance with the Constitution of the Russian Federation, federal laws and other regulatory legal acts of the Russian Federation;
- performing its activities in accordance with the Organization's charter;
- exercising the rights and fulfilling the obligations by the parties of the employment relationship;
- organization of individual (personalized) registration of employees with the mandatory pension insurance system;
- filling in and submitting to the executive bodies and other authorized organizations the required reporting forms;
- implementation of civil law relations;
- bookkeeping;
- holding contests and other events;
- access control.

2.4. Personal data of employees may be processed solely for the purposes of the laws and other regulatory legal acts.

3. LEGAL GROUNDS FOR PERSONAL DATA PROCESSING

3.1. The legal ground for personal data processing is a set of regulatory legal acts, pursuant to which and in accordance with which the Operator processes personal data, including:

- The Constitution of the Russian Federation;
- Civil Code of the Russian Federation;
- Labor Code of the Russian Federation;
- Tax Code of the Russian Federation;
- Federal Law No. 7-FZ On Non-Profit Organizations dated 12/01/1996;
- Federal Law No. 402-FZ On Accounting dated 06/12/2011;
- Federal Law No. 167-FZ On Compulsory Pension Insurance in the Russian Federation dated 15/12/2001;
- other regulatory legal acts governing relations associated with the Operator's activities.

3.2. The legal ground for personal data processing also includes:

- the Operator's charter;
- contracts concluded between the Operator and Personal Data Subjects;
- consent of Personal Data Subjects to their personal data processing.

4. SCOPE AND CATEGORIES OF PERSONAL DATA PROCESSED, CATEGORIES OF PERSONAL DATA SUBJECTS

4.1. The content and scope of personal data processed shall comply with the stated processing purposes stipulated in Section 2 of the Policy. The personal data processed shall not be redundant with respect to the stated purposes of its processing.

4.2. The Operator may process personal data of the following categories of Personal Data Subjects.

4.2.1. Candidates for employment with the Operator:

- surname, first name, patronymic;
- gender;
- citizenship;
- date of birth;
- place of birth;
- contact phone number;
- e-mail address;
- photo;
- education, work experience, qualifications;
- other personal data provided by the candidates in the CVs and cover letters.

4.2.2. Employees and former employees of the Operator:

- surname, first name, patronymic;
- gender;
- citizenship;
- date of birth;
- place of birth;
- passport data (passport number, series, issued by and when, code of issuing department);
- details of the document replacing the passport (document name, number, series, issued by and when, code of issuing department);
- residential (registered) address;
- actual residential address;
- contact phone number;
- e-mail address;
- photo;
- education, including the following information: level of education, educational institution, year of graduation, diploma number, specialty/area, qualification;
- individual taxpayer number (INN);
- insurance number of an individual personal account (SNILS);
- marital status and family composition;
- employment, including place of work, insurance (labor) experience, position held, transfers to other positions;
- military registration;
- bank account details;
- wages and other payments;
- awards and incentives;
- other personal data provided by employees according to requirements of legislation of the Russian Federation.

4.2.3. Family members of the Operator's employees:

- surname, first name, patronymic;
- degree of relationship;
- date of birth;
- residence (registration) address;
- other personal data provided by employees according to requirements of legislation of the Russian Federation.

4.2.4. Operator's clients and counterparties (individuals and/or individual entrepreneurs):

- surname, first name, patronymic;
- date of birth;
- place of birth;
- passport data (passport number, series, issued by and when, code of issuing department);
- details of the document replacing the passport (document name, number, series, issued by and when, code of issuing department);
- residential (registered) address;
- actual residential address;
- contact phone number;
- e-mail address;
- individual taxpayer number (INN);
- insurance number of an individual personal account (SNILS);
- bank account details;
- other personal data provided by the clients and counterparties (individuals and/or individual entrepreneurs) necessary for contracts conclusion and execution.

4.2.5. Representatives/employees of the Operator's clients and counterparties (individuals):

- surname, first name, patronymic;
- passport data (passport number, series, issued by and when, code of issuing department);
- details of the document replacing the passport (document name, number, series, issued by and when, code of issuing department);
- residential (registered) address;
- actual residential address;
- contact phone number;
- e-mail address;
- position;
- other personal data provided by representatives/employees of the clients and counterparties necessary for contracts conclusion and execution.

4.2.6. Individuals who have purchased or intend to purchase the services of the Organization, services of third parties through the Organization's intermediary or who are not in contractual relations with the Organization, provided that their personal data is included in the Organization's automated systems and processed in accordance with legislation on personal data:

- surname, first name, patronymic;
- e-mail address;

- phone number;
- date of birth;
- bank card details;
- information on actions performed on the Operator's websites, including, russpass.ru, russpass.com and in SSPASS mobile application, welcome.moscow, discovermoscow.com, and information on the devices used (such as geolocation, IP addresses, Cookies).

4.2.7. Participants, jury members, other persons taking part in the contests, shows and other events held by the Operator (their representatives):

- surname, first name, patronymic;
- gender;
- citizenship;
- date of birth;
- place of birth;
- passport data (passport number, series, issued by and when, code of issuing department);
- details of the document replacing the passport (document name, number, series, issued by and when, code of issuing department);
- birth certificate details (number, series, issued by and when);
- residential (registered) address;
- actual residential address;
- contact phone number;
- e-mail address;
- photo;
- video image;
- education, including the following information: level of education, educational institution, year of graduation, diploma number, specialty/area, qualification;
- individual taxpayer number (INN);
- insurance number of an individual personal account (SNILS);
- marital status and family composition;
- employment, including place of work, insurance (labor) experience, position held, transfers to other positions;
- bank account details;
- other personal data provided by employees according to requirements of legislation of the Russian Federation.

4.3. The Operator does not process biometric and special categories of personal data related to race, nationality, political views, religious or philosophical beliefs, health status, or intimate life, except in cases stipulated by the legislation of the Russian Federation.

5. PROCEDURE AND CONDITIONS FOR PERSONAL DATA PROCESSING

5.1. The Operator shall process personal data according to requirements of legislation of the Russian Federation.

5.2. The Operator shall collect, record, systematize, accumulate, store, clarify (update, change), extract, use, transfer (distribute, provide, grant access), depersonalize, block, delete and destroy personal data.

5.3. The Operator shall process personal data by the following methods:

- non-automated personal data processing;
- automated personal data processing with or without transmission of the information received via information and telecommunication networks.

5.4. Personal data shall be processed with the Personal Data Subjects' consent to their personal data processing and without it in cases stipulated by legislation of the Russian Federation, namely:

- personal data is processed with the Personal Data Subject's consent to their personal data processing;
- personal data processing is required to achieve the goals stipulated by the international agreement of the Russian Federation or law, and to carry out and fulfill the functions, powers and duties assigned to the operator set out by legislation of the Russian Federation;
- personal data is processed in connection with participation of a person in the constitutional, civil, administrative, criminal proceedings, proceedings in arbitration courts;
- personal data processing is required for execution of a judicial act, or act of another body or official to be executed in accordance with legislation of the Russian Federation on enforcement proceedings;
- personal data processing is required for execution of the powers of federal executive bodies, bodies of state extra-budgetary funds, executive bodies of state power of the constituent entities of the Russian Federation, local self-government bodies and functions of organizations involved in rendering state and municipal services, respectively, stipulated by Federal Law No. 210-FZ On Organization of Rendering State and Municipal Services dated July 27, 2010, including registration of the Personal Data Subject on the unified portal of state and municipal services and/or regional portals of state and municipal services;
- personal data processing is required to fulfill a contract to which the Personal Data Subject is a party or beneficiary or guarantor, and to conclude a contract initiated by the Personal Data Subject or contract under which the Personal Data Subject will be a beneficiary or guarantor;
- personal data processing is required to protect the life, health, or other vital interests of the Personal Data Subject, if obtaining of the Personal Data Subject's consent is impossible;
- personal data processing is required to exercise the rights and legitimate interests of the operator or third parties, including in cases stipulated by the Federal Law On Protection of Rights and Legitimate Interests of Individuals when Carrying Out Activities for Repayment of Overdue Debts and on Amendments to the Federal Law On Microfinance Activities and Microfinance Organizations, or to achieve socially significant purposes, provided that the Personal Data Subject's rights and freedoms are not violated;

- personal data processing is required for professional activities of a journalist and/or legitimate activities of the mass media or scientific, literary, or other creative activities, provided that the Personal Data Subject's rights and freedoms are not violated;
- personal data is processed for statistical or other research purposes, except for the purposes referred to in art. 15 of the Law on Personal Data, subject to mandatory depersonalization of personal data;
- personal data obtained as a result of depersonalization of personal data is processed to improve the efficiency of state or municipal management, as well as for other purposes stipulated by Federal Law No. 123-FZ On Conducting Experiment to Establish Special Regulation to Create Necessary Conditions for Development and Implementation of Artificial Intelligence Technologies in Federal City of Moscow, Constituent Entity of the Russian Federation and Amendments to Articles 6 and 10 of the Federal Law On Personal Data dated April 24, 2020, and Federal Law No. 258-FZ On Experimental Legal Regimes in the Field of Digital Innovations in the Russian Federation dated July 31, 2020, according to the procedure and on the terms and conditions stipulated by these federal laws;
- personal data is processed that is subject to publication or mandatory disclosure in accordance with federal law.

5.5. The Operator's employees are allowed to process personal data, when their job duties include personal data processing.

5.6. Personal data is processed through:

- receiving personal data in oral and written form directly from the Personal Data Subjects;
- obtaining personal data from publicly available sources;
- entering personal data into the Operator's logs, registers and information systems;
- use of other personal data processing methods.

5.7. Disclosure to third parties and dissemination of personal data without the Personal Data Subject's consent is prohibited, unless otherwise stipulated by the Law on Personal Data. The consent to processing of personal data authorized by the Personal Data Subject for distribution shall be issued separately from other Personal Data Subject's consents to their personal data processing.

5.8. Personal data shall be transferred to the inquiry and investigation bodies, Federal Tax Service, Pension Fund of the Russian Federation, Social Insurance Fund and other authorized executive bodies and organizations according to requirements of legislation of the Russian Federation.

5.9. The Operator shall take necessary legal, organizational and technical measures to protect personal data against unauthorized or accidental access thereto, its destruction, alteration, blocking, dissemination and other unauthorized actions, including:

- identification of threats to security of personal data during its processing;
- adoption of local regulations and other documents governing relations in the field of personal data processing and protection;

- appointment of persons in charge of ensuring the personal data security in the Operator's business units and information systems;
- creating the conditions necessary for personal data handling;
- organizing management of the documents containing personal data;
- organizing work with information systems used to process personal data;
- personal data storage under conditions that ensure its safety and prevention of unauthorized access thereto;
- organizing training of the Operator's employees involved in the personal data processing.

5.10. The Operator shall store personal data in the form that allows to identify the Personal Data Subject, no longer than required by the purposes of personal data processing, unless the personal data storage term is established by the Law on Personal Data or contract.

5.11. When collecting personal data, including through the Internet, the Operator shall ensure recording, systematization, accumulation, storage, clarification (updating, alteration), extraction of personal data of citizens of the Russian Federation using databases located on the territory of the Russian Federation, except in cases specified in the Law on Personal Data.

6. PERSONAL DATA UPDATING, CORRECTION, DELETION AND DESTRUCTION, RESPONSES TO SUBJECTS' REQUESTS FOR ACCESS TO PERSONAL DATA

6.1. Confirmation of the fact of personal data processing by the Operator, legal grounds and purposes of personal data processing, and other information specified in part 7, art. 14 of the Law on Personal Data, shall be provided by the Operator to the Personal Data Subject or their representative when applying or receiving a request from the Personal Data Subject or their representative.

The information provided shall not include personal data related to other Personal Data Subjects, except in cases of legitimate grounds for disclosure of such personal data.

The request shall contain:

- the number of the main identity document of the Personal Data Subject or their representative, date of issue of said document and issuing authority;
- information confirming participation of the Personal Data Subject in relations with the Operator (contract number, contract date, conditional verbal designation and/or other details), or information otherwise confirming the fact of personal data processing by the Operator;

- signature of the Personal Data Subject or their representative.

The request may be sent in the form of an electronic document and signed with an electronic signature in accordance with legislation of the Russian Federation.

If the Personal Data Subject's request fails to specify all necessary details according to requirements of the Law on Personal Data, or the Personal Data Subject has no access rights to the requested information, the Personal Data Subject shall be provided with a reasoned refusal.

The right of the Personal Data Subject to access to their personal data may be restricted in accordance with part 8, art. 14 of the Law on Personal Data, including if the Personal Data Subject's access to their personal data violates the rights and legitimate interests of third parties.

6.2. If inaccurate personal data is identified when the Personal Data Subject or their representative or Roskomnadzor applies with a request, the Operator shall block personal data related to such Personal Data Subject at the time of such application or receipt of said request for the period of verification, if blocking of personal data does not violate the rights and legitimate interests of the Personal Data Subject or third parties.

Should the fact of personal data inaccuracy be confirmed, the Operator shall, based on the information provided by the Personal Data Subject or their representative or Roskomnadzor, or other necessary documents, clarify personal data within 7 (seven) business days from the date of submission of such information and unblock personal data.

6.3. If unlawful personal data processing is identified when the Personal Data Subject or their representative or Roskomnadzor files an application (request), the Operator shall block the unlawfully processed personal data related to such Personal Data Subject at the time of such application or receipt of the request.

6.4. Upon achievement of the purposes of personal data processing and in case the Personal Data Subject withdraws their consent to its processing, personal data shall be destroyed unless:

- otherwise specified in the contract to which the Personal Data Subject is a party, beneficiary or guarantor;
- the Operator is not entitled to process personal data without the Personal Data Subject's consent on the grounds stipulated by the Law on Personal Data or other federal laws;
- otherwise stipulated by another agreement between the Operator and Personal Data Subject.