

POLICY
Processing Personal Data Using Websites
The Autonomous Non-Profit Organization Moscow Project Office for Tourism and Hospitality Development

Last updated: 1 August 2026

1. General

1.1. This document sets forth the Policy on the Processing of Personal Data Using Websites of the Autonomous Non-Profit Organization Moscow Project Office for Tourism and Hospitality Development (hereinafter referred to as the Policy and the Organization, respectively).

1.2. The terms and definitions used in this Policy shall have the meanings set forth by the legislation and national standards of the Russian Federation based on which this Policy has been developed, including, in particular:

– Federal Law No. 152-FZ of 27 July 2006 On Personal Data (hereinafter referred to as the Law);

– Ordinance of the Government of the Russian Federation No. 1119 of 1 November 2012 On Approval of Requirements for the Protection of Personal Data during Its Processing in Personal Data Information Systems (hereinafter referred to as the Resolution);

– Ordinance of the Government of the Russian Federation No. 687 of 15 September 2008 On Approval of the Regulation on the Specific Features of Personal Data Processing Carried Out without the Use of Automation Tools;

– GOST R 50739-95. Computer Equipment. Protection against Unauthorized Access to Information. General Technical Requirements.

1.3. The Policy and all amendments and supplements thereto shall be approved by an instruction of the Organization.

1.4. The Policy shall be published on the websites owned by the Organization.

2. Legal Grounds for Personal Data Processing

The legal grounds for the processing of personal data by the Organization are the consent of the personal data subject to and specified in Clauses 2–11 of Part 1 of Article 6, Part 2 of Article 10, and Part 2 of Article 11 of the Law.

3. Purposes, Scope and Categories of Personal Data Processed; Categories of Personal Data Subjects

3.1. For each purpose of processing personal data by the Organization through websites on the Internet, the scope, categories and lists of personal data processed, and the categories of personal data subjects shall be approved in accordance with the Appendix to this Policy, together with the methods and terms of processing and storing and the procedure for destroying personal data upon achieving the processing purposes or upon occurring other legal grounds for destruction.

3.2. One or more third-party web analytics services (Yandex.Metrica and others) may be used on websites owned by the Organization. The scope and conditions for collecting technical data and other information concerning user actions that may constitute personal data through third-party software (Yandex.Metrica and others) are determined directly by the respective right holders. They can include requested data (time, referral source, IP address), operating-system data (type, version, screen resolution), device data and location data, and browser data (type, version, cookies). The Organization shall not be liable for the manner in which third parties (Yandex.Metrica and others) use anonymized data.

4. Principles and Conditions of Processing Personal Data

4.1. The Organization shall observe the following principles when processing personal data:

4.1.1. Personal data shall be processed lawfully and fairly;

4.1.2. Personal data processing shall be limited to achieving specific, predetermined and lawful purposes;

4.1.3. Personal data shall not be processed in a manner incompatible with the purposes for which the personal data was collected;

4.1.4. Databases containing personal data processed for mutually incompatible purposes shall not be combined;

4.1.5. Only personal data that correspond to the purposes of processing shall be processed;

4.1.6. The content and scope of the personal data processed shall correspond to the stated processing purposes;

4.1.7. The personal data processed shall not be excessive in relation to the stated processing purposes;

4.1.8. The accuracy and sufficiency of personal data, and where necessary the relevance to the purposes of processing, shall be ensured during processing;

4.1.9. Necessary measures shall be taken to erase or rectify incomplete or inaccurate personal data;

4.1.10. Personal data shall be stored in a form permitting identifying the personal data subject for no longer than required by the purposes of processing, unless a storage period is set forth by the Law or by an agreement to which the personal data subject is a party, beneficiary or guarantor. Personal data processed shall be destroyed or anonymized as soon as the processing purposes are achieved or the need to achieve such purposes expires, unless otherwise provided by the effective legislation of the Russian Federation.

4.2. The Organization processes personal data both with and without using automation tools. The processing operations performed by the Organization include acquiring, recording, systematizing, accumulating, storing, rectifying (updating and altering), retrieving, using, transferring (providing and accessing), blocking, erasing, destroying, disseminating and anonymizing.

4.3. When collecting personal data, the Organization shall ensure that recording, systematization, accumulation, storage, rectification (updating, alteration) and retrieval of personal data are performed using databases located within the territory of the Russian Federation.

4.4. The Organization may entrust personal data processing to another person with the data subject's consent, unless otherwise provided by the law. Such entrustment must be based on an agreement. The agreement must specify the list of personal data, the operations to be performed, the purposes of processing, and require the processor to maintain confidentiality and comply with applicable legal requirements. A mandatory condition for providing personal data to and/or entrusting the processing of personal data to another person shall be the obligation of the parties to maintain confidentiality and to ensure the security of personal data during processing. The instruction to process personal data shall specify the list of personal data, the list of actions (operations) involving using personal data by the processor, and the purposes of processing, and shall require such person to maintain confidentiality of personal data, to comply with Part 5 of Article 18 and Article 18.1 of the Law, and, at the Organization's request during the term of the instruction, including prior to processing providing documents and other information confirming that the measures are taken, and requirements are in place to ensure the security and protection of personal data in accordance with the Law applicable to fulfilling the Organization's instruction. Where the Organization entrusts personal data processing to another person, the Organization shall remain liable in case that person discloses the personal data subject.

4.5. Personal data processing shall be discontinued i) upon termination of the Organization's activities (liquidation or reorganization); ii) upon achievement of the processing purposes or when the need to achieve such purposes ceases to exist, unless otherwise provided by the Law; iii) upon withdrawal by the personal data subject of consent to personal data processing where there are no legal grounds for continuing such processing; iv) at the request of the competent authority; or v) pursuant to a court decision.

4.6. The Organization shall carry out cross-border transfers of personal data in accordance with Article 12 of the Law. The Organization shall notify the Federal Service for Supervision of Communications, Information Technology and Mass Media of its intention to carry out cross-border transfers of personal data in accordance with the established procedure.

4.7. The Organization shall ensure the confidentiality of personal data. Employees of the Organization who have obtained access to personal data shall not disclose personal data to third parties or disseminate such data without the consent of the personal data subject, unless otherwise provided by the Law.

4.8. The Organization shall process other categories of personal data subject to the following conditions:

4.8.1. Processing is necessary to achieve the purposes provided for by an international treaty of the Russian Federation or by the Law, or to exercise and perform the functions, powers and duties imposed on the operator by the effective legislation of the Russian Federation;

4.8.2. Personal data is processed where a valid legal ground for such processing exists;

4.8.3. Processing is necessary for the performance of an agreement to which the personal data subject is a party, beneficiary or guarantor agreeing to the initiative of the data subject or an agreement under which the personal data subject will be a beneficiary or guarantor. An agreement concluded with a personal data subject may not contain provisions restricting the rights and freedoms of the personal data subject, establishing cases for processing the personal data of minors unless otherwise provided by the effective legislation of the Russian Federation, or making the personal data subject's inaction a condition for the conclusion of the agreement.

4.9. The Organization may process special categories of personal data in the cases specified in Article 10 of the Law.

5. Applying Personal Data Security Measures Adopted by the Organization

5.1. The Organization shall take, or ensure taking required and sufficient legal, organizational and technical measures to protect personal data against unlawful or accidental access, destruction, alteration, blocking, copying, provision or dissemination, as well as against other unlawful actions involving the use of personal data.

5.2. Such measures implemented by the Organization include:

5.2.1. Appointing a person responsible for organizing personal data processing;

5.2.2. Issuing internal regulations on personal data processing that define, for each processing purpose: a) the categories and lists of personal data processed, b) the categories of subjects whose personal data is processed, c) the methods and periods of processing and storage, and d) the procedure for destroying personal data upon achievement of the processing purposes or upon occurrence of other lawful grounds, as well as internal regulations establishing procedures intended to prevent and detect violations of the effective legislation of the Russian Federation in the field of personal data processing and protection and to remedy the consequences of such violations;

5.2.3. Conducting internal control over the compliance of personal data processing with the effective legislation of the Russian Federation on personal data, personal data protection requirements, and the Organization's internal documents governing personal data processing and protection;

5.2.4. Assessing the harm that may be caused to personal data subjects in the event of violating the Law and correlating such harm against the measures taken by the Organization to ensure performance of the obligations set forth by the Law;

5.2.5. Familiarizing employees of the Organization with provisions of the effective legislation of the Russian Federation on personal data, the Organization's internal documents on personal data processing, and personal data protection requirements;

5.2.6. Applying, or ensuring the application of legal, organizational and technical measures to secure personal data in accordance with Article 19 of the Law, including in particular:

a) identifying threats to the security of personal data during its processing in the Organization's personal data information systems;

b) implementing technical and organizational measures to protect personal data processed in the Organization's personal data information systems based on the requirements approved by the Resolution and the requirements outlined in Instruction No. 21 of the Federal Service for Technical and Export Control of Russia (FSTEC of Russia) dated 18 February 2013 On Approval of the Composition and Content of Organizational and Technical Measures for Ensuring the Security of Personal Data during Processing in Personal Data Information Systems, developed based on

determining the categories of personal data processed in the Organization's personal data information systems and the level of protection required for such personal data, taking into account the estimate of current personal data security threats and the potential harm to personal data subjects in case these threats are realized;

c) establishing a security regime for premises hosting personal data information systems that prevents unauthorized access or presence in such premises;

d) ensuring the accounting and safekeeping of machine-readable media containing personal data;

e) organizing access to personal data processed in personal data information systems;

f) using information security tools that have undergone conformity assessment procedures under the effective legislation of the Russian Federation in the field of information security;

g) implementing antivirus monitoring and detection;

h) using network security (filtering) firewalls;

i) promptly installing updates to software used in personal data information systems and to information security tools;

j) organizing the protection of the technical facilities of personal data information systems.

The procedure, form, processes and frequency for implementing the legal, organizational and technical measures adopted by the Organization to protect personal data shall be set forth by the Organization's internal regulations.

5.3. In accordance with the established procedure, the Organization shall ensure interaction with the State System for Detection, Prevention and Elimination of the Consequences of Computer Attacks on Information Resources of the Russian Federation, including informing the federal executive authority responsible for the security of computer incidents that resulted in unlawful transfer (provision, dissemination or access) of personal data.

5.4. Personal data processed without the use of automation tools shall be kept separate from other information, in particular by recording such data on separate physical media containing personal data (hereinafter, Physical Media), in dedicated sections or in fields of forms (templates).

5.5. When personal data is recorded on Physical Media, personal data processed for purposes known to be incompatible shall not be recorded on the same medium. Where different categories of personal data are processed without the use of automation tools, a separate Physical Medium shall be used for each category of personal data.

5.6. Persons who process personal data without the use of automation tools (including employees of the Organization and persons performing such processing under an agreement with the Organization) shall be informed that they are processing personal data processed by the Organization without automation tools, of the categories of personal data processed, and of the specific features and rules governing such processing set forth by regulatory legal acts of the Russian Federation and by the Organization's internal regulations.

5.7. Where standard document forms, by the nature of the information contained therein, contemplate or permit the inclusion of personal data (hereinafter, a Standard Form), the following conditions shall be observed:

5.7.1. The Standard Form or documents related to it (instructions for completion, cards, registers and logs) shall contain information on the purpose of processing personal data without the use of automation tools, the name and address of the Organization, the surname, first name, patronymic and address of the personal data subject, the source from which the personal data were obtained, the processing period, a list of actions involving use of personal data to be performed during processing, and a general description of the personal data processing methods used by the Organization;

5.7.2. Where written consent to personal data processing is required, the Standard Form shall provide a field in which the personal data subject may indicate consent to processing carried out without the use of automation tools;

5.7.3. The Standard Form shall be designed so that each personal data subject whose data is contained in the document can review his or her own personal data contained therein without infringing the rights and legitimate interests of other personal data subjects;

5.7.4. The Standard Form shall prevent the combination of fields intended for entering personal data processed for purposes known to be incompatible.

5.8. Where the purposes for processing personal data recorded on a single Physical Medium are incompatible, and the Physical Medium does not permit such personal data to be processed separately from other personal data recorded on the same medium, the measures shall be taken to ensure separate processing, including:

5.8.1. If certain personal data must be used or disseminated separately from other personal data recorded on the same Physical Medium, this personal data should be used or disseminated without copying other data;

5.8.2. Where part of the personal data must be destroyed or blocked, the Physical Medium shall be destroyed or blocked after first copying the information not subject to destruction or blocking in a manner that prevents simultaneous copying of the personal data subject to destruction or blocking.

5.9. Where permitted by the Physical Medium, part of the personal data may be destroyed or anonymized in a manner that prevents further processing of such personal data while preserving the ability to process other data recorded on the medium (for example, by erasure or redaction). The provisions of this Clause and Clause 5.8 of the Policy shall also apply where it is necessary to ensure separate processing of personal data and information that does not constitute personal data recorded on the same Physical Medium.

5.10. Personal data processed without the use of automation tools shall be rectified by updating or altering the data on the Physical Medium or, where the technical characteristics of the Physical Medium do not permit this, by recording information about the changes on the same medium or by creating a new Physical Medium containing the corrected personal data.

5.11. Measures to ensure the security of personal data processed without the use of automation tools:

5.11.1. Personal data processing without the use of automation tools shall be organized so that, for each category of personal data, the storage locations of the personal data (Physical Media) can be identified and a list can be established of persons who process such personal data or have access to them;

5.11.2. Personal data (Physical Media) processed for different purposes shall be stored separately;

5.11.3. Physical Media shall be stored under conditions ensuring the integrity and security of personal data and preventing unauthorized access. The list of measures necessary to ensure such conditions, the procedure for implementing them, and the list of persons responsible for their implementation shall be set forth by the Organization's internal regulations.

6. Updating, Rectifying, Erasing and Destroying Personal Data. Handling Requests by Personal Data Subjects to Access Personal Data

6.1. Rights of personal data subjects.

6.1.1. Right of a personal data subject to access his or her personal data:

a) a personal data subject has the right to obtain information concerning the processing of his or her personal data (hereinafter, the Information Requested by the Subject), including:

confirmation that the Organization processes personal data; the legal grounds and purposes of personal data processing; the personal data processing methods used by the Organization; the name and location of the Organization; information on persons (other than employees of the Organization) who have access to personal data or to whom personal data may be disclosed pursuant to an agreement with the Organization or pursuant to the Law; the personal data processed that relate to the relevant personal data subject and the source from which they were obtained, unless another procedure for providing such data is set forth by the Law; the periods of processing, including storage periods; the procedure for exercising the rights of a personal data subject set forth by the Law; information on completed or intended cross-border transfers of personal data; the name or full name and address of the person processing personal data on behalf of the Organization, if processing has been or will be entrusted to such person; information on the methods used by the operator to perform the obligations set forth by Article 18.1 of the Law; and other information provided for by the Law.

b) a personal data subject has the right to receive the Information Requested by the Subject, except where access by the personal data subject to his or her personal data would infringe the rights and legitimate interests of third parties;

c) a personal data subject may require the Organization to rectify, block or destroy his or her personal data where such data is incomplete, outdated, inaccurate, unlawfully obtained, or unnecessary for the stated processing purpose, and may take other measures provided for by the Law to protect his or her rights;

d) the Information Requested by the Subject shall be provided by the Organization to the personal data subject in an accessible form and shall not contain personal data relating to other personal data subjects, unless there are lawful grounds for disclosure of such personal data;

e) the Information Requested by the Subject shall be provided by the Organization to the personal data subject or his or her representative within ten (10) business days from the date of the application or receipt of the request. This period may be extended by no more than five (5) business days if the Organization sends the personal data subject a reasoned notice stating the grounds for the extension. The request shall contain the number of the principal identity document of the personal data subject or representative, the date of issue and issuing authority, information confirming the personal data subject's relationship with the Organization (date and number of agreement, a conventional verbal designation and/or other information) or other information confirming that the Organization processes the personal data, and the signature of the personal data subject or representative (hereinafter, the Required Identification Information). The request may be submitted as an electronic document signed with an electronic signature in accordance with the effective legislation of the Russian Federation. The Organization shall provide the information to the personal data subject or representative in the same form in which the relevant application or request was submitted, unless the application or request states otherwise;

f) where the Information Requested by the Subject and the personal data processed have been made available to the personal data subject for review upon request, the personal data subject may submit a repeat request to the Organization to obtain such information and review the personal data no earlier than thirty (30) days after the initial application or request, unless a shorter period is set forth by the Law, a regulatory legal act adopted pursuant thereto, or an agreement to which the personal data subject is a party, beneficiary or guarantor;

g) a personal data subject may submit a repeat request before expiration of the period specified in Clause 6.1.1(f) of this Policy where the requested information and/or the personal data processed were not provided in full for review following consideration of the initial application. In addition to the Required Identification Information, the repeat request shall state the grounds for submitting it;

h) the Organization may refuse to comply with a repeat request that does not satisfy the requirements applicable to repeat requests. Such refusal shall be reasoned. The Organization shall bear the burden of proving that the refusal to comply with the repeat request is justified.

6.1.2. Right to challenge acts or omissions of the Organization:

a) if a personal data subject considers that the Organization processes his or her personal data in violation of the Law or otherwise infringes his or her rights and freedoms, the personal data subject may challenge the acts or omissions of the Organization before the authority competent to protect the rights of personal data subjects or in court;

b) a personal data subject has the right to protection of his or her rights and legitimate interests, including compensation for losses and/or non-pecuniary damage through judicial proceedings.

6.2. The Organization shall process personal data for the purpose of promoting goods, works or services in the market through direct contact with a potential consumer by means of communications only with the prior consent of the personal data subject.

6.3. Duties of the operator.

6.3.1. Duties of the operator when collecting personal data:

a) when collecting personal data, the Organization shall, at the request of the personal data subject, provide the requested information concerning the processing of his or her personal data in accordance with Part 7 of Article 14 of the Law;

b) where provision of personal data and/or obtaining the personal data subject's consent to personal data processing by the Organization is mandatory under the Law, the Organization shall explain to the personal data subject the legal consequences of refusing to provide his or her personal data and/or give consent to their processing;

c) where personal data is obtained from a source other than the personal data subject, the Organization shall, before processing begins, provide the personal data subject with the following information:

the name and address of the Organization; the purpose and legal ground for personal data processing; the list of personal data; the intended users of the personal data; the rights of the personal data subject set forth by the Law; and the source from which the personal data were obtained.

d) the Organization shall not provide the personal data subject with the information otherwise required when personal data is obtained from a source other than the personal data subject in the following cases:

the personal data subject has been notified that the Organization processes his or her personal data; the Organization obtained the personal data pursuant to the Law or in connection with performance of an agreement to which the personal data subject is a party, beneficiary or guarantor; personal data authorized by the subject for dissemination are processed subject to the prohibitions and conditions set out in Article 10.1 of the Law; the Organization processes personal data for statistical or other research purposes or for the professional activities of a journalist or scientific, literary or other creative activities, provided that the rights and legitimate interests of the personal data subject are not infringed; or providing such information would infringe the rights and legitimate interests of third parties.

6.3.2. Duties of the operator upon an application by a personal data subject or receipt of a request from a personal data subject or representative, or from the authority competent to protect the rights of personal data subjects:

a) in accordance with the established procedure, the Organization shall inform the personal data subject or representative whether it holds personal data relating to that subject and shall provide an opportunity to review such personal data within ten (10) business days from receipt of the request. This period may be extended by no more than five (5) business days if the Organization sends the personal data subject a reasoned notice stating the grounds for extending the period for providing the requested information;

b) if the Organization refuses, following an application or request, to provide information concerning the existence of personal data relating to the relevant subject or to provide such personal data to the personal data subject or representative, the Organization shall provide a reasoned written response within no more than ten (10) business days from the date of the application or receipt of the request. This period may be extended by no more than five (5) business days if the Organization sends the personal data subject a reasoned notice stating the grounds for extending the period for providing the requested information;

c) the Organization shall provide the personal data subject or representative, free of charge, with an opportunity to review personal data relating to that subject. Within no more than seven (7) business days after the personal data subject or representative provides information confirming that the personal data is incomplete, inaccurate or outdated, the Organization shall make the necessary corrections. Within no more than seven (7) business days after the personal data subject or representative provides information confirming that such personal data were obtained unlawfully or are unnecessary for the stated processing purpose, the Organization shall destroy such personal data. The Organization shall notify the personal data subject or representative of the corrections made and measures taken and shall take reasonable measures to notify third parties to whom the personal data of that subject were transferred;

d) at the request of the authority competent to protect the rights of personal data subjects, the Organization shall provide the necessary information to that authority within ten (10) business days from receipt of the request. This period may be extended by no more than five (5) business days if the Organization sends the competent authority a reasoned notice stating the grounds for extending the period for providing the requested information.

6.3.3. Duties of the operator to remedy violations of law committed during personal data processing and to rectify, block and destroy personal data:

a) where unlawful processing of personal data is identified following an application or request from the personal data subject or representative, or a request from the authority competent to protect the rights of personal data subjects, the Organization shall block the unlawfully processed personal data relating to that subject, or ensure that it is blocked if processing is carried out by another person acting on the Organization's instructions, from the time of such application or receipt of the request for the duration of the review. Where inaccurate personal data is identified following an application by the personal data subject or representative, their request, or a request from the competent authority, the Organization shall block the personal data relating to that subject, or ensure that it is blocked if processing is carried out by another person acting on the Organization's instructions, from the time of such application or receipt of the request for the duration of the review, provided that such blocking does not infringe the rights and legitimate interests of the personal data subject or third parties;

b) where the inaccuracy of personal data is confirmed, the Organization shall, based on information provided by the personal data subject or representative, the authority competent to protect the rights of personal data subjects, or other necessary documents, rectify the personal data or ensure their rectification if processing is carried out by another person acting on the Organization's instructions within seven (7) business days from provision of such information, and shall lift the blocking of the personal data;

c) where unlawful processing of personal data by the Organization or by a person acting on the Organization's instructions is identified, the Organization shall cease the unlawful processing, or ensure that such person ceases it, within no more than three (3) business days from the date on which it was identified. If it is impossible to make the processing lawful, the Organization shall destroy such personal data, or ensure their destruction, within no more than ten (10) business days from the date on which the unlawful processing was identified. The Organization shall notify the personal data subject or representative of the violations remedied or the personal data destroyed and, where the application or request was forwarded by the authority competent to protect the rights of personal data subjects, shall also notify that authority;

d) where unlawful or accidental transfer (provision, dissemination or access) of personal data is established and has resulted in violating the rights of personal data subjects, the Organization shall, from the time the incident is discovered by the operator, the authority competent to protect the rights of personal data subjects, or another interested person, notify the authority competent to protect the rights of personal data subjects in the following manner:

- within 24 hours of the incident, its presumed causes that resulted in infringement of the rights of personal data subjects, the presumed harm caused to such rights, and the measures taken to remedy the consequences of the incident, and shall provide information on the person authorized by the Organization to liaise with the competent authority on matters relating to the identified incident;
- and within 72 hours of the incident, the results of the internal investigation of the incident and information on the persons whose actions caused the incident, if available.

e) upon achievement of the purpose of personal data processing, the Organization shall cease processing or ensure that it is ceased if processing is carried out by another person acting on the Organization's instructions, and shall destroy the personal data or ensure their destruction within no more than thirty (30) days from the date the processing purpose is achieved, unless otherwise provided by an agreement to which the personal data subject is a party, beneficiary or guarantor, another agreement between the Organization and the personal data subject, or where the Organization is entitled to process personal data without the subject's consent on grounds provided for by the Law or other regulatory acts;

f) if a personal data subject withdraws consent to the processing of his or her personal data, the Organization shall cease processing or ensure that such processing is ceased if it is carried out by another person acting on the Organization's instructions and, where retention of the personal data is

no longer required for processing, shall destroy the personal data or ensure their destruction within no more than thirty (30) days from receipt of the withdrawal, unless otherwise provided by an agreement to which the personal data subject is a party, beneficiary or guarantor, another agreement between the Organization and the personal data subject, or where the Organization is entitled to process personal data without the subject's consent on grounds provided for by the Law or other regulatory acts;

g) where a personal data subject submits a request to the Organization to cease processing personal data, the operator shall cease processing or ensure that such processing is ceased, if carried out by a person processing personal data, within no more than ten (10) business days from receipt of the request, except in the cases provided for by the Law. This period may be extended by no more than five (5) business days if the operator sends the personal data subject a reasoned notice stating the grounds for extending the period;

h) where it is impossible to destroy personal data within the specified period, the Organization shall block such personal data or ensure that it is blocked if processing is carried out by another person acting on the Organization's instructions, and shall ensure destruction of the personal data within no more than six (6) months, unless another period is established by federal law.

6.4. The rules for considering requests submitted to the Organization by personal data subjects or by their representatives, as well as the forms used to consider such requests, shall be approved by an instruction of the Organization.

7. Liability

7.1. Persons violating the Law shall be liable under effective Russian law.

7.2. Non-pecuniary damage caused to a personal data subject as a result of infringement of his or her rights, violation of the personal data processing rules established by the Law, or violation of personal data protection requirements established pursuant to the Law shall be compensated in accordance with the effective legislation of the Russian Federation. Compensation for non-pecuniary damage shall be independent of compensation for property damage and losses incurred by using the personal data subject.

**List of Personal Data Processed in Personal Data Information Systems Using Websites of the Autonomous Non-Profit Organization Moscow
Project Office for Tourism and Hospitality Development**

No.	Name of Personal Data Information System	Information Content (category of personal data subjects: list of personal data)	Personal Data Category	Purpose of Personal Data Processing	Actions with Personal Data	Method of Personal Data Processing	Legal Grounds (Conditions) for Personal Data Processing by Personal Data Information System	Period of Personal Data Processing (conditions for termination), Including Storage Term
1	Tourism Services	Non-employee subjects – individuals receiving tourism services: • full name (surname, first name, patronymic); • identity-document details (series, number, date of issue, etc.); • identity-document details of a foreign national, stateless person or refugee (series, number, date of issue, etc.);	Other	Provision of tourism services to individuals; improvement of the quality of services provided.	Collection, recording, systematization, accumulation, storage, rectification (updating, alteration), retrieval, use, transfer (provision, access) in cases provided for by the effective legislation of the Russian Federation, an agreement or	Mixed	Personal data is processed on the grounds specified in Clauses 2 and 5 of Part 1 of Article 6 of Federal Law No. 152-FZ, for the performance of an agreement to which the personal data subject is a party or for entering into an agreement at	Personal data shall be processed until the purposes of processing are achieved or the need to achieve them ceases to exist, unless another period is established by the effective legislation of the Russian Federation, an agreement, the consent of the

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		• driver's license details; • Moscow Social Card details; • pension certificate details; • student ID details; • financial details; • telephone number; • email address.			the consent of the personal data subject, anonymization, blocking, erasing and destroying personal data.		the initiative of the personal data subject, as well as in cases provided for by the effective legislation of the Russian Federation on tourism activities. Where personal data cannot be processed based on law or an agreement, processing shall be carried out based on the personal	personal data subject, the operator's records retention schedule, or archival retention rules. Processing shall cease upon achievement of the processing purposes, expiry of storage periods, withdrawal of consent where no other

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							data subject's consent.	lawful ground for processing exists, termination of contractual or employment relations, liquidation of the operator, or in other cases provided for by the effective legislation of the Russian Federation. Personal data shall be destroyed in accordance with the

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								procedure and time limits established in Section 6 of the Policy.
2	Specialized Industry Portal Russpass.Business	Non-employee subjects – employees of organizations and other representatives of the tourism industry: • full name (surname, first name, patronymic); • telephone number; • email address; • place of work and position;	Other	Holding events involving representatives of the tourism industry.	Collection, recording, systematization, accumulation, storage, rectification (updating, alteration), retrieval, use, transfer (provision, access) in cases provided for by the effective legislation of the Russian	Mixed	Personal data is processed based on the personal data subject's consent, an application to participate in an event, or another agreement with the personal data subject or the organization	Personal data shall be processed until the purposes of processing are achieved or the need to achieve them ceases to exist, unless another period is established by the effective legislation of the Russian Federation, an

No.	Name of Personal Data Information System	Information Content (category of personal data subjects: list of personal data)	Personal Data Category	Purpose of Personal Data Processing	Actions with Personal Data	Method of Personal Data Processing	Legal Grounds (Conditions) for Personal Data Processing by Personal Data Information System	Period of Personal Data Processing (conditions for termination), Including Storage Term
					Federation, an agreement or the consent of the personal data subject, anonymization, blocking, erasing and destroying personal data.		represented by that subject.	agreement, the consent of the personal data subject, the operator's records retention schedule, or archival retention rules. Processing shall cease upon achievement of the processing purposes, expiry of storage periods, withdrawal of

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								consent where no other lawful ground for processing exists, termination of contractual or employment relations, liquidation of the operator, or in other cases provided for by the effective legislation of the Russian Federation. Personal data shall be destroyed in

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								accordance with the procedure and time limits established in Section 6 of the Policy.
3	EXPO: Congress and Exhibition Activities	Non-employee subjects: employees of organizations in the tourism and related industries who participate in an event; persons applying to organize an event; persons applying for accreditation at a venue and/or event; persons registering an organization; and	Other	Holding events involving representative s of the tourism industry; selection of applications.	Collection, recording, systematization, accumulation, storage, rectification (updating, alteration), retrieval, use, transfer (provision, access) in cases provided for by the effective	Mixed	Personal data is processed based on the personal data subject's consent and for the purposes of entering into, performing or administering an agreement, an application for participation,	Personal data shall be processed until the purposes of processing are achieved or the need to achieve them ceases to exist, unless another period is established by the effective legislation of

No.	Name of Personal Data Information System	Information Content (category of personal data subjects: list of personal data)	Personal Data Category	Purpose of Personal Data Processing	Actions with Personal Data	Method of Personal Data Processing	Legal Grounds (Conditions) for Personal Data Processing by Personal Data Information System	Period of Personal Data Processing (conditions for termination), Including Storage Term
		individuals who have applied to participate in an event. List of personal data: • full name (surname, first name, patronymic); • telephone number; • email address; • place of work and position;			legislation of the Russian Federation, an agreement or the consent of the personal data subject, anonymization, blocking, erasing and destroying personal data.		an application for accreditation, admission to an event venue, or organizing the participation of the personal data subject or the organization represented by that subject in an exhibition, business or other event. Passport details and bank account details shall be processed only	the Russian Federation, an agreement, the consent of the personal data subject, the operator's records retention schedule, or archival retention rules. Processing shall cease upon achievement of the processing purposes, expiry of storage

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							where necessary for admission, accreditation, execution of an agreement, payment, reimbursement, or compliance with the requirements of the effective legislation of the Russian Federation.	periods, withdrawal of consent where no other lawful ground for processing exists, termination of contractual or employment relations, liquidation of the operator, or in other cases provided for by the effective legislation of the Russian Federation. Personal data

No.	Name of Personal Data Information System	Information Content (category of personal data subjects: list of personal data)	Personal Data Category	Purpose of Personal Data Processing	Actions with Personal Data	Method of Personal Data Processing	Legal Grounds (Conditions) for Personal Data Processing by Personal Data Information System	Period of Personal Data Processing (conditions for termination), Including Storage Term
								shall be destroyed in accordance with the procedure and time limits outlined in Section 6 of the Policy.