



## Privacy Policy

This Personal Data Privacy Policy (hereinafter referred to as the Policy confidentiality) applies to all information that the website of the hotel complex "Old Town" & SPA, (hereinafter referred to as hotel-oldtown.ru) located on the domain name hotel-oldtown.ru (as well as its subdomains), can receive about The user while using the site hotel-oldtown.ru (as well as its subdomains), its programs and its products.

1. Definition of terms

1.1 In this Policy confidentiality the following terms are used:

1.1.1. "Site administration" (hereinafter referred to as the Administration) – authorized employees to manage the site of the hotel complex "Old City", acting on behalf of a limited liability company responsibility of "Europe" who organize and (or) carry out the processing personal data, and also determines the purposes of processing personal data, composition of personal data to be processed, actions (operations) performed with personal data.

1.1.2. "Personal data" – any information relating to a directly or indirectly defined or identifiable physical to the person (subject of personal data).

1.1.3. "Processing of personal data" – any action (operation) or set of actions (operations) performed with using automation tools or without using such tools with personal data, including collection, recording, systematization, accumulation, storage, clarification (updating, changing), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data.

1.1.4. "Confidentiality of personal data" – mandatory requirement for the Operator or other person who has access to personal data to not allow their distribution without consent of the subject of personal data or the presence of another legal basis.

1.1.5. "Website of the hotel complex "Old Town" & SPA" is a collection of interconnected web pages located on the Internet according to a unique address (URL): hotel-oldtown.ru, as well as its subdomains.

1.1.6. "Subdomains" are pages or a set of pages located on third-level domains belonging to the site of the hotel complex "Old Town" & SPA, as well as others temporary pages, at the bottom of which the contact information of the Administration is indicated.

1.1.5. "User of the website of the hotel complex "Old Town" & SPA" (hereinafter User) - a person who has access to the website of the hotel complex "Old city" & SPA, via the Internet and using information, materials and products of the site of the hotel complex "Old Town" & SPA.

1.1.7. "Cookies" - a small piece of data sent by a web server and stored on a computer the user who the web client or web browser sends to the web server every time in an HTTP request when trying to open a page of the corresponding site.

1.1.8. "IP address" is a unique network address of a node in a computer network through which The user gains access to hotel-oldtown.ru.

1.1.9. "Product" is a product that The user orders on the website and pays through payment systems.

2. General provisions

2.1. Using the website of the hotel complex "Old Town" & SPA The user means agreement with this Privacy Policy and conditions for processing the User's personal data.

2.2. In case of disagreement with terms of the Privacy Policy, the User must stop using the website of the hotel complex "Old Town" & SPA.

2.3. This Privacy Policy applies to the website of the hotel complex "Old Town" & SPA. hotel-oldtown.ru does not control and is not responsible responsibility for third party websites that the User can access via links available on the website of the hotel complex "Old Town" & SPA.

2.4. The administration does not verify the accuracy of the personal data provided By the user.

3. Subject of the privacy policy

3.1. This Policy confidentiality establishes the Administration's obligations for non-disclosure establishing and ensuring a regime for protecting the confidentiality of personal data, which the User provides at the request of the Administration when registering on website of the hotel complex "Old Town" & SPA, when subscribing to the e-mail newsletter or when making a reservation.



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3.2. Personal Information, permitted for processing under this Privacy Policy are provided by the User by filling out forms on the website of the hotel complex "Old Town" & SPA and include the following information: 3.2.1. last name first name, patronymic of the User based on the citizen's passport data; 3.2.2. User's contact phone number; 3.2.3. email address (e-mail) 3.2.4. place residence of the User (if necessary) 3.2.5. insurance number of an individual personal account.

3.3. hotel-oldtown.ru protects Data that is automatically transmitted when visiting pages: IP address; information from cookies; browser information access time; referrer (address of the previous page). 3.3.1. Disabling cookies may result in the inability to access parts of the site that require authorization. 3.3.2. hotel-oldtown.ru collects statistics about the IP addresses of its visitors.

This information used to prevent, identify and solve technical problems. 3.4. Any other personal information not specified above (visit history, browsers, operating systems, etc. used) must be stored securely and non-proliferation, except for the cases provided for in paragraphs. 5.2. and 5.3. of this Privacy Policy.

4. Purposes for collecting personal information user 4.1. The Administration may use the User's personal data for the following purposes: 4.1.1. Identification of the User registered on the site hotel complex "Old Town" & SPA for its further authorization, placing an order and other actions. 4.1.2. Providing the User with access to personalized data from the website of the hotel complex "Old Town" & SPA. 4.1.3. Establishing feedback with the User, including sending notifications, requests regarding the use of the site of the hotel complex "Old" city" & SPA, provision of services and processing of requests and applications from the User. 4.1.4. Determining the location of the User to ensure security and prevent fraud. 4.1.5. Confirmation of the accuracy and completeness of the personal data provided by the User. 4.1.6. Create an account for use of parts of the site of the hotel complex "Old Town" & SPA, if The user agreed to create an account. 4.1.7. Notifications to the User by email. 4.1.8. Providing the User with effective technical support if problems arise related to the use of the site hotel complex "Old Town" & SPA. 4.1.9. Providing the User with his consent to special offers, pricing information, newsletters and other information on behalf of the site hotel complex "Old Town" & SPA. 4.1.10. Carrying out advertising activities with the consent of the User.

5. Methods and terms for processing personal information information 5.1. The processing of the User's personal data is carried out without limitation of the period, in any legal way, including in personal data information systems using automation tools or without the use of such tools.

5.2. The User agrees that the Administration has the right to transfer personal data to third parties, in particular, courier companies services, postal organizations (including electronic), telecommunication operators, solely for the purpose of fulfilling the User's order placed on website of the hotel complex "Old Town" & SPA, including delivery of documentation or e-mail messages.

5.3. The User's personal data may be transferred to authorized government bodies of the Russian Federation only on the grounds and in the manner established by the legislation of the Russian Federation Federation.

5.4. In case of loss or disclosure of personal data, the Administration has the right not to inform the User about the loss or disclosure of personal data.

5.5. The administration takes the necessary organizational and technical measures to protect the User's personal information from unlawful or accidental access, destruction, modification, blocking, copying, distribution, as well as from other unlawful actions of third parties.

5.6. Administration together with the User takes all necessary measures to prevent losses or other negative consequences caused by loss or disclosure personal data of the User.

6. Rights and obligations of the parties 6.1. User has the right:

6.1.1. Make a free decision to provide your personal data, necessary for using the site of the hotel complex "Old Town" & SPA, and consent to their processing. 6.1.2. Update, supplement the provided information about personal data if this information changes.



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6.1.3. The User has the right to receive information from the Administration regarding processing of his personal data, unless such right is limited in accordance with with federal laws. The user has the right to demand that the Administration clarify his personal data, block it or destroy it if personal data is incomplete, outdated, inaccurate, illegal received or are not necessary for the stated purpose of processing, and also take measures provided by law to protect their rights. 6.2. The administration is obliged to:

6.2.1. Use the information received solely for the purposes specified in clause 4 of this Privacy Policy. 6.2.2. Provide keeping confidential information secret, not disclosing without the prior written permission of the User, and not selling, exchange, publication, or disclosure in other possible ways of transmitted personal data of the User, with the exception of paragraphs. 5.2 and 5.3. of this Privacy Policy. 6.2.3. Take precautions to protect yourself confidentiality of the User's personal data in accordance with the procedure, usually used to protect this type of information in existing business transactions. 6.2.4. Block personal data relating to the relevant User from the moment the User or his legal representative or authorized body to protect the rights of personal data subjects during the inspection period, in the event of identification of inaccurate personal data or unlawful actions.

7. Responsibility of the parties

7.1. An administration that fails to fulfill its obligations bears liability for losses incurred by the User due to unlawful use of personal data in accordance with the legislation of the Russian Federation, with the exception of cases provided for in paragraphs. 5.2., 5.3. and 7.2. of this Privacy Policy. 7.2. In case of loss or disclosure of Confidential Information, the Administration is not responsible if this confidential information:

7.2.1. Became public domain before its loss or disclosures. 7.2.2. Was received from a third party prior to its receipt Administration of the Resource. 7.2.3. Was disclosed with the consent of the User. 7.3. The user bears full responsibility for compliance with legal requirements of the Russian Federation, including laws on advertising, on the protection of copyright and related rights, on the protection trademarks and service marks, but not limited to the above, including full responsibility for the content and form of materials. 7.4. User acknowledges that responsibility for any information (including, but not limited to: data files, texts, etc.) to which it may have access as part site of the hotel complex "Old Town" & SPA, is borne by the person who provided such information

7.5. The user agrees that the information provided to him as part of the website of the hotel complex "Old Town" & SPA may be an object of intellectual property, the rights to which are protected and belong to other Users, partners or advertisers who post such information on the website of the Old Town & SPA hotel complex. The user does not have the right to make changes, transfer to rent, loan, sell, distribute or create derivative works based on such Content (in whole or in part), for unless such actions have been expressly authorized in writing owners of such Content in accordance with the terms of a separate agreement. 7.6. In relation to text materials (articles, publications located in free public access on the website of the hotel complex "Old Town" & SPA) their distribution is permitted provided that a link to [hotel-oldtown.ru](http://hotel-oldtown.ru). 7.7. The Administration is not responsible to the User for any loss or damage incurred by the User as a result of deletion, failure or failure to store any Content and other communications data contained on the website of the hotel complex "Old Town" & SPA or transmitted through it. 7.8. The administration is not responsible for any direct or indirect losses resulting from: use or inability to use the site or individual services; unauthorized access to the User's communications; statements or conduct of any third party Online. 7.9. The administration is not responsible for any information posted by the user on the website of the hotel complex "Old Town" & SPA, including but not limited to: copyrighted information, without the express consent of the copyright owner.

8. Dispute resolution

8.1. Before When filing a claim in court regarding disputes arising from the relationship between the User and the Administration, it is mandatory to submit a claim (a written proposal or an electronic proposal for a voluntary settlement of the dispute).



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8.2. Recipient of the claim within 30 calendar days from the date of receipt of the claim, notifies the claimant in writing or electronically of the results of consideration of the claim. 8.3. If no agreement is reached, the dispute will be referred to the Arbitration Court of Ryazan. 8.4. TO this Privacy Policy and the relationship between the User and The Administration applies the current legislation of the Russian Federation. 9. Additional conditions 9.1. The administration has the right to make changes to this Privacy Policy without the consent of the User. 9.2. New The privacy policy comes into force from the moment it is posted on the website hotel complex "Old Town" & SPA, unless otherwise provided by the new edition of the Privacy Policy. 9.3. Any suggestions or questions regarding this Privacy Policy should be addressed to: sua@hotel-oldtown.ru 9.4. The current Privacy Policy is posted on the page at hotel-oldtown.ru/politika Updated: May 09, 2021 Ryazan, Limited Liability Company "Europe"