

## **Privacy Policy**

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### **1. What This Privacy Policy Regulates**

This Privacy Policy (hereinafter referred to as the "Policy") applies to all information, including personal data as understood by applicable legislation (hereinafter referred to as "Personal Information"), that LLC "AZIMUT HOTELS COMPANY" (TIN 7726548255) may receive about you while you use the AZIMUT Hotels website located at: <https://azimuthotels.ru>, <https://azimuthotels.com> (hereinafter referred to as the "Website"), as well as in the course of AZIMUT Hotels fulfilling any agreements or contracts concluded with you in connection with your use of the Website. AZIMUT Hotels may also receive Personal Information from its partners (hereinafter referred to as "Partners"), the websites, programs, products, or services of which you use (for example, from advertisers of AZIMUT Hotels), and from other sources with publicly available personal data. In relevant cases, the transfer of Personal Information is possible only in cases established by applicable legislation and is carried out based on special agreements between AZIMUT Hotels and each of the Partners.

The use of the Website and its services means your unconditional consent to this Policy and the terms of processing Personal Information specified herein; if you do not agree with these terms, you must refrain from using the Website and its services. If you refuse to provide your data, AZIMUT Hotels does not guarantee the technical possibility of independently booking accommodation and/or receiving personalized offers and discounts within the loyalty program.

### **2. Who Processes the Information**

To ensure your use of the Website, your Personal Information is collected and used by LLC "AZIMUT HOTELS COMPANY" (TIN 7726548255), registered at: Moscow, Olympic Avenue, 18/1.

### **3. What Is the Purpose of Processing Personal Information**

AZIMUT Hotels always processes your Personal Information for specific purposes and only that Personal Information that is relevant to achieving such purposes. In particular, we process your Personal Information for the following purposes:

- 3.1. Providing you access to the Website, including access to your account if you are registered on the respective Website;
- 3.2. Identifying you for the purpose of booking on the AZIMUT Hotels Website;
- 3.3. Providing technical support in case of problems related to the use of the Website, maintaining feedback, including sending you notifications, requests, and information related to the operation of the Website, fulfilling agreements with you, and processing your inquiries, applications, claims, and complaints;
- 3.4. Concluding, executing, and terminating civil law contracts;
- 3.5. Personalizing advertising and offers based on your preferences and other Personal Information about you available to AZIMUT Hotels;
- 3.6. Conducting newsletters and promotional mailings with your consent, engaging in advertising activities (contextual and targeted advertising) in accordance with applicable legislation of the Russian Federation;
- 3.7. Informing you about ongoing events and promotions;

- 3.8. Enhancing the usability of the Website, including showing the most relevant search results and providing a more personalized Website experience, as well as improving other products, applications, and services of AZIMUT Hotels;
- 3.9. Creating new products, utilities, and offers from AZIMUT Hotels;
- 3.10. Collecting, processing, and presenting statistical data, marketing, and other research;
- 3.11. Identifying security threats to the Website, users, AZIMUT Hotels, and/or third parties;
- 3.12. Processing your payments.

#### **4. What Personal Information About You Does AZIMUT Hotels Collect**

AZIMUT Hotels does not verify the Personal Information you provide, except in cases specified in the user agreement or terms of use of the Website, and cannot assess its accuracy or whether you possess sufficient legal capacity to provide your Personal Information. However, AZIMUT Hotels assumes that you provide accurate and sufficient Personal Information and update it in a timely manner. In case of providing inaccurate Personal Information, you bear the risk of any potential negative consequences (for example, refusal to restore access due to unverifiability based on previously provided Personal Information, inability to refund payments, and other consequences).

AZIMUT Hotels may collect the following categories of Personal Information about you while you are using the Website:

- 4.1. Personal information provided by you during registration (creating an account), such as your first name, last name, patronymic, gender, citizenship, phone number, email address, residential/registration address, date and place of birth;
- 4.2. electronic data (HTTP headers, IP address, cookies, web beacons/pixel tags, browser identifier information, hardware and software information, Wi-Fi network data);
- 4.3. information about your activity while using the Website (for example, search query history, booking data);
- 4.4. geolocation information;
- 4.5. information about you that we receive from our Partners in accordance with the terms of agreements between you and the relevant Partner, and agreements between AZIMUT Hotels and the Partner;
- 4.6. data of your payment cards, other payment information provided by you, as well as obtained from Partners or other parties involved in processing payment transactions using the Website and/or in connection with AZIMUT Hotels providing paid services;
- 4.7. data about your guests and/or legal representatives;
- 4.8. data about claims, complaints, and other inquiries (including data contained therein);
- 4.9. other information about you necessary for processing in accordance with the terms governing the use of the Website.

AZIMUT Hotels also uses cookies to collect Personal Information and link such personal information to your device and web browser (see Section 11 of this Policy).

#### **5. What is the legal basis for processing your Personal Information**

This Policy is developed in accordance with the requirements of Federal Law No. 152-FZ of July 27, 2006, "On Personal Data," other regulatory acts of the Russian Federation in the field of protection and processing of personal data, as well as local acts of AZIMUT Hotels.

## **6. How does AZIMUT Hotels protect your Personal Information**

In most cases, Personal Information is processed automatically without access to it by any employees of AZIMUT Hotels. If such access is required, it may only be granted to those employees of AZIMUT Hotels who need it to perform their tasks. To protect and ensure the confidentiality of data, all employees comply with the local acts of AZIMUT Hotels, as well as the rules and principles for processing Personal Information established by current legislation. They also follow all technical and organizational security measures in place to protect your Personal Information.

AZIMUT Hotels has also implemented sufficient technical and organizational measures to protect Personal Information from unauthorized, accidental, or unlawful destruction, loss, alteration, unfair use, disclosure, or access, as well as other illegal forms of processing. These security measures are implemented in accordance with the requirements established by Federal Law No. 152-FZ of July 27, 2006, "On Personal Data," as well as other regulatory legal acts of the Russian Federation in the field of protection and processing of personal data.

## **7. Who else has access to your Personal Information and to whom can it be transferred**

7.1 AZIMUT Hotels may transfer your Personal Information to its employees (within the limits specified in Section 6 of this Policy). AZIMUT Hotels may also transfer your Personal Information to individuals with whom AZIMUT Hotels has management and commercial concession agreements.

7.2 AZIMUT Hotels may also transfer Personal Information to third parties in the following cases:

7.2.1 The transfer of Personal Information is necessary for you to use the Website/service of the Website or to fulfill a specific agreement or contract with you;

7.2.2 The transfer of Personal Information to Partners, such as website and application owners, advertising networks, and other partners that provide AZIMUT Hotels with services related to placing and displaying advertisements on websites, programs, products, or services owned or controlled by such Partners;

7.2.3 The transfer of Personal Information to advertisers or other Partners who display advertisements for you on the AZIMUT Hotels Website, as well as to information service providers or consultants;

7.2.4 The transfer of Personal Information to individuals providing information to identify security threats to the Website, users, AZIMUT Hotels, and/or third parties;

7.2.5 The transfer of Personal Information to individuals involved in organizing the acceptance of your payments and conducting payment transactions using the Website (international payment systems, payment instrument providers, banks, and other financial organizations, etc.);

7.2.6 The transfer of Personal Information to individuals to whom rights or obligations under contracts related to providing services to users of the Website have been assigned or who exercise control over individuals providing the Website as a result of their acquisition (through acquiring legal entities, intellectual property objects, assets, property rights, and otherwise);

7.2.7 The transfer of Personal Information to any third party for the purpose of ensuring legal protection for AZIMUT Hotels or third parties in case you violate the User Agreement of AZIMUT Hotels (<https://azimuthotels.com/rules>), this Policy, or the terms governing the use of the Website, or in situations where there is a threat of such violation

7.2.8. The transfer of Personal Information to individuals conducting SMS and email newsletters to inform you about bonuses, promotions, and offers from AZIMUT Hotels.

7.2.9. In other cases established by the current legislation of the Russian Federation.

## **8. Where Your Personal Information is Stored and Processed**

Your personal information will be stored in the Russian Federation. For users from Russia: AZIMUT Hotels carries out recording, systematization, accumulation, storage, clarification (updating, modification) and retrieval of personal data of citizens of the Russian Federation using databases located on the territory of the Russian Federation.

If you are located in a jurisdiction where your consent is required for transferring your personal information to another jurisdiction, by using this Site, you give AZIMUT Hotels your explicit and unambiguous consent to such transfer or storage, and/or processing of information in other specified jurisdictions, including Russia.

## **9. How Long We Keep Your Personal Information**

AZIMUT Hotels will keep your personal information for as long as necessary to achieve the purpose for which it was collected, or to comply with legal requirements and regulations.

## **10. Your Rights**

10.1 You have the right to:

- access the information that AZIMUT Hotels processes and/or stores about you;
- request the deletion of your Personal Information or any part of it, as well as withdraw your consent to the processing of your Personal Information;
- request the clarification of your Personal Information, its blocking, or destruction in cases where the Personal Information is incomplete, outdated, inaccurate, unreliable, or unlawfully obtained;
- appeal the actions (or inactions) of AZIMUT Hotels to the Federal Service for Supervision of Communications, Information Technology and Mass Media (Roskomnadzor) or in court if you believe that AZIMUT Hotels is processing your Personal Information in violation of the requirements of the current legislation of the Russian Federation.

AZIMUT Hotels will fulfill these requests in accordance with applicable legislation. In cases provided for by applicable legislation, you may also have other rights not specified above.

10.2. How You Can Exercise Your Rights

To exercise the above rights, please contact AZIMUT Hotels by sending a postal letter to: 129110, Moscow, Olympic Avenue, 18/1, or an email to: [info@azimuthotels.com](mailto:info@azimuthotels.com).

## **11. How We Use Cookies and Other Similar Technologies on the Site**

11.1. What Are Cookies and Why Does AZIMUT Hotels Use Them

Cookies are small pieces of data that are received and processed by the device you use to access the Site. Cookies store and send back to the Site information that helps with your interaction with the Site and allows us to remember your preferences over time, such as browser settings or recognizing your account.

#### 11.2. How Long Cookies Are Stored on Your Device

AZIMUT Hotels uses the information contained in cookies only for the purposes mentioned above, after which the collected data will be stored on your device for a period that may depend on the relevant type of cookies, but will not exceed the time necessary to achieve their purpose, after which they will be automatically deleted from your system.

#### 11.3. Who Else Has Access to Information Contained in Cookies

Personal information collected through cookies placed on your device may be transferred to and accessed by AZIMUT Hotels and/or third parties specified in Section 7 of this Policy. The use of Personal Information outside the Site for advertising purposes, if any, may be subject to separate user agreements available on third-party websites.

#### 11.4. Consent to Use Cookies

By using the AZIMUT Hotels Site, you confirm your consent to the use of cookies. If you do not agree to our use of cookies, you should appropriately adjust your browser settings or refrain from using the Site.

If after using the AZIMUT Hotels Site you wish to change your decision regarding cookies, you can do so by deleting the cookies stored in your browser (this can usually be done in the browser settings — please refer to your browser's user guide or the website of its developer). If you refuse to use cookies, this may result in some features of the Site being unavailable to you and may affect your ability to use the Site. You can also change your browser settings to accept or decline all cookies by default or cookies from specific sites, including the AZIMUT Hotels Site. If you have approved the use of cookies on the AZIMUT Hotels Site, we will consider that you have consented to the use of cookies on the Site.

### **12. Update of this Policy**

This Policy may be amended. AZIMUT Hotels reserves the right to unilaterally make changes, including but not limited to cases where the changes are related to amendments in applicable legislation, as well as when the changes are related to the operation of the Site.

The new Policy takes effect from the moment it is posted on the Site, unless otherwise specified in the new version of the Policy. If, after the new version of the Policy comes into effect, you continue to use the Site and its services, you automatically confirm your agreement with the changes.