

APPROVED
by an order of Biblio-Globus Turopoperator LLC
dated May 14, 2022 No. 216/1

**PERSONAL DATA PROCESSING
POLICY OF BIBLIO-GLOBUS TUROOPERATOR LLC**

Moscow, 2022

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Terms and Definitions

1. Personal Data Operator (Operator): Biblio-Globus Turoperator Limited Liability Company, registered address: Russian Federation, 123376, Moscow, Krasnaya Presnya St., No. 28, room 517, tel. +7 (495) 109-25-00; postal address: 123376 Russian Federation, Moscow, Krasnaya Presnya St., No. 28, room 517; website: <https://www.bgoperator.com/>
2. Personal data processing means any action (operation) or set of actions (operations) in respect of personal data, performed with or without automation tools. Personal data processing includes, but is not limited to: collection, recording, systematization, accumulation, storage, adjustment (updating, modification), retrieval, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction.
3. Automated personal data processing means personal data processing using computer technology.
4. Dissemination of personal data means actions aimed at disclosing personal data to the public at large.
5. Provision of personal data means actions aimed at disclosing personal data to a specific person or a specific number of persons.
6. Blocking of personal data means temporary cessation of personal data processing.
7. Destruction of personal data means actions that make it impossible to restore the content of personal data in the personal data information system and (or) that result in the destruction of tangible media containing personal data.
8. Publicly available personal data means personal data, access to which is provided to an unlimited number of persons with the consent of the subject or to which, in accordance with federal laws, the requirement to maintain confidentiality does not apply.
9. Depersonalization of personal data means actions that make it impossible to determine the ownership of personal data by a specific personal data subject without the use of additional information;
10. Cross-border transfer of personal data means transfer of personal data to the territory of a foreign state to a government agency of a foreign state, a foreign individual or a foreign legal entity.
11. Consent to the processing of personal data means voluntary performance of implicative actions by the User when registering on the Operator's website at <https://www.bgoperator.com>, namely, checking off the appropriate box, which is provided for the User to confirm consent to the processing of personal data (hereinafter referred to as PD) provided by him/her and an unconditional acceptance of the procedures and conditions set out in the User Agreement and this Privacy Policy for handling the Users' PD.

12. User account control panel means a web page designed to use the capabilities provided by the Website to the User, by the Company to the User, maintaining the relevance of the User's contact information and providing them with other information necessary for the Company to provide access to the Website. Access to the account page is organized via a secure protocol and only after the User has been identified. The User's personal data is specified, changed and stored in the User account control panel.
13. User account (Account/Personal account) means a space on the Internet protected by a password. Contains information about the user and records of his/her interaction with the Website. The account contains personal and contact information provided by the user upon registration on the Website and during interaction with the Website, namely: full name, email address, contact phone number.
14. User means a visitor to the Website. A User is a personal data subject upon completion of the registration procedure on the Website in the established manner.
15. Cookie file means a small piece of data that is sent by the website server and stored on the User's device. It is used to save certain data about you, for example, any settings and preferences.
16. Authorized employee means an employee appointed by an order of the General Director of the Operator as responsible for ensuring information security and protecting personal data.

1. General Provisions

1.1 This personal data processing policy (hereinafter referred to as the Policy) is a system of views that defines the main approaches to the processing and protection of personal data adopted by Biblio-Globus Turoperator Limited Liability Company (the Operator), registered address: Russian Federation, 123376, Moscow, Krasnaya Presnya St., No. 28, room 517.

1.2 The Policy has been developed in accordance with the Federal Law of July 27, 2006 No. 152-FZ "On Personal Data" and establishes the general principles and rules for ensuring the protection of personal data during their processing.

1.3 This Policy applies to all information containing personal data of personal data subjects that the Operator and related legal entities may receive about the personal data subject during the exercise of the Operator's activities.

1.4 The Policy applies to all the operations carried out by Biblio-Globus Turoperator LLC in relation to personal data with or without the use of automation technology.

1.5 The provisions of this Policy serve as the basis for the Operator to develop internal regulations detailing the issues related to the processing and protection of personal data.

1.6 The Policy is of a public nature and must be published on the Operator's official website or an unrestricted access to the Policy must be otherwise provided.

2. Purpose of Personal Data Processing

2.1 The Operator processes personal data for the following purposes:

- carrying on the business of providing tourism services in accordance with contractual obligations;
- providing information to the personal data subject on the activities of the Operator, on the services provided by the Operator;
- complying with the provisions of contracts entered into with the personal data subject;
- conducting surveys and research;
- attracting and selecting candidates for work, conducting personnel management, employer-employee relations;
- supporting the activities of the Operator;
- performing other tasks, functions, powers and duties assigned to the Operator in accordance with the laws of the Russian Federation.

3. Classification of Personal Data and Personal Data Subjects

3.1 Personal data include any information directly or indirectly related to a specific or determinable individual (personal data subject), processed by the Operator to achieve predetermined goals.

3.2 The Operator processes personal data of the following categories of personal data subjects:

- Users of the operator's website located at: <https://www.bgoperator.com>;
- subjects whose personal data processing is related to the performance of the terms and conditions of agreements entered into;
- employees and their close relatives;
- job candidates;
- employees of counterparties;
- individuals staying on the Operator's premises;
- visitors to the Operator's premises;

3.3 The operator processes the following categories of personal data of personal data subjects:

- publicly available personal data;
- other personal data, including: information on the sex, age, passport data, TIN, insurance number of the state pension insurance certificate (SNILS), address information and contact details, information about citizenship, payment details, information about a work permit and rights of residence in other countries, information about military registration, information on criminal convictions, information on family members, information on education and profession, information on advanced training and additional education, information on academic degrees, information on achievements;
- information automatically received when accessing the Operator's websites using cookies, which are fragments of text that are automatically saved in the memory of the user's Internet browser using the Operator's website, as well as information received as a result of the actions of subjects on the Operator's website, including sending comments, requests, reviews and questions.

3.4 The operator has the right to process a special category of personal data relating to the health condition of a personal data subject in cases specified by current laws.

4. Procedure for and Conditions of Personal Data Processing

4.1 When processing personal data, the Operator shall follow the principles of legality, ensuring the protection and confidentiality of personal data, compliance with the purposes of processing, and the inadmissibility of combining databases containing personal data, which are processed for purposes incompatible with each other.

4.2 The Operator shall carry out the activities related to personal data processing on the basis of and in accordance with the requirements of the current laws, the list of which is provided in the appendix.

4.3 Personal data shall be processed by the Operator on the basis of:

- a declaration of will (request) from the personal data subject;
- the terms and conditions of contracts entered into with the subject;
- requirements of the laws of the Russian Federation;
- consent of the personal data subject to the processing of his/her personal data.

4.4 As part of the exercise of its statutory activities, the Operator shall collect, record, systematize, accumulate, store, adjust (update, change), retrieve, use, transfer, depersonalize, block, delete and destroy personal data.

4.5 The Operator shall carry out cross-border transfers of personal data and shall

do everything necessary to ensure an adequate level of protection of personal data.

4.6 Based on the agreement in place, the Operator has the right to entrust the processing of personal data to another person with the consent of the personal data subject and on the basis of current contractual obligations, unless otherwise provided by applicable law.

4.7 The Operator shall carry out automated processing of personal data using computing resources located on the territory of the Russian Federation, including the Yandex Metrica Internet service.

4.8 When processing personal data without the use of automation tools, the Operator shall comply with the requirements of the Decree of the Government of the Russian Federation dated September 15, 2008 No. 687 "On the approval of the Regulation relating to particular aspects of personal data processing carried out without the use of automation tools".

4.9 The storage periods for personal data shall be determined subject to:

- the achievement of the purposes of personal data processing;
- the demands of the personal data subject (if there are special instructions);
- the storage periods established by the laws of the Russian Federation;
- the local regulations of the operator.

4.10 Upon expiration of the established periods, personal data shall be destroyed or depersonalized in accordance with the procedure established by the operator's internal documents.

4.11 When processing personal data, the Operator shall take the necessary and sufficient legal, organizational and technical measures to protect personal data from unauthorized or accidental access, destruction, modification, blocking, copying, transfer, as well as from other illegal actions in relation to personal data, including:

- by appointing a person responsible for organizing the processing of personal data;
- by adopting internal regulations detailing the rules for the processing and protection of personal data;
- by ensuring that the employees directly involved in the processing of personal data are aware of the requirements of the laws of the Russian Federation on personal data, internal regulations on the processing of personal data, best practices for the processing and protection of personal data;
- by obtaining, in cases specified by the laws of the Russian Federation, consents of personal data subjects to the processing of their personal data;

- by arranging for records to be kept of information resources and documents containing personal data;
- by identifying threats to the security of personal data when processing them in personal data information systems;
- by implementing organizational and technological measures to ensure the security of personal data when processing them in personal data information systems;
- by implementing internal control over the measures taken to ensure the security of personal data.

4.12 In the event that an inaccuracy of personal data is detected, the Operator shall block the personal data and ensure that the personal data is adjusted within 7 business days from the date of provision of such information.

4.13 In the event that it is established that personal data are processed illegally, the Operator shall, within a period not exceeding 3 business days from the date when the fact is established, remedy the violations committed or, if it is impossible to ensure that the personal data are processed legally, destroy such personal data within a period not exceeding 10 (ten) business days from the date when it is established that the personal data are processed illegally, notifying the personal data subject or his/her legal representative thereof.

4.14 The Operator shall stop processing personal data in the following cases:

- the goals of personal data processing are achieved;
- the consent of the personal data subject to the processing of his personal data is revoked;
- the Operator's activities are discontinued.

4.15 The Authorized Employee responsible for organizing the processing and protection of personal data shall be the Director of the IT Infrastructure Directorate, e-mail: compliance@bgoperator.com

4.16 In the event that there is information that personal data may have potentially been provided by a minor or a legally incapable person without the necessary consent of their legal representatives, any interested person shall be entitled to notify the Operator thereof.

4.17 Such notice shall be sent in writing to the Authorized Employee by e-mail to compliance@bgoperator.com.

The Operator must:

- check the accuracy of the information received;
- take measures to protect personal data;
- notify legal representatives;
- respond to a request within 30 (thirty) calendar days of the date of the request.

4.18 When processing a request, the Operator shall ensure compliance with the requirements of the laws on the protection of personal data.

5. Rights of a Personal Data Subject

5.1 Personal data subjects shall have the right to:

- receive information about the processing of their personal data;
- receive information concerning the processing of their personal data in the manner, form and within the period established by law;
- adjust their personal data;
- revoke consent to the processing and dissemination of their personal data;
- file a petition to the authorized body in charge of protection of the rights of personal data subjects or in court against any illegal actions or inaction during the processing and protection of their personal data;
- protect their rights and legitimate interests, including rights to receive compensation for damages and (or) compensation for moral damage in court;
- exercise other rights as provided by the laws of the Russian Federation.

6. Processing of Requests from Personal Data Subjects

6.1 Information concerning the processing of personal data shall be provided to the personal data subject or his/her legal representative on the basis of an enquiry or a request sent to the Operator.

6.2 Such enquiry may be sent in writing to the following address: 123376 Moscow, Krasnaya Presnya Street, No. 28, Room 517, or in the form of an electronic document signed with an electronic digital signature in accordance with the laws of the Russian Federation to the Authorized Employee responsible for organizing the processing and protection of personal data by e-mail to: compliance@bgoperator.com.

6.3 Following an enquiry, information shall be provided or refused to the personal data subject or his/her representative within the period established by Federal Law of July 27, 2006 No. 152-FZ "On Personal Data".

6.4 Information shall be provided to the personal data subject in an accessible

form, to the exclusion of personal data relating to other personal data subjects, except where there are lawful grounds for disclosing such personal data.

7. Policy Changes

- 7.1 The Operator shall have the right to make changes to the Policy at any time
- 7.2 Changes shall take effect at the time of publication of the new version of the Policy on the website at <https://www.bgoperator.com>.