

PRIVACY STATEMENT

MIRROS HOTELS GROUP

1. General statements

The present Privacy Statement describes the policy on processing and protection of Personal data (hereinafter referred to as «Statement») of the Clients of LLC "MIROS HOTELS GROUP" company (hereinafter referred to as «Operator»), defines the objectives, content and processing of Clients' Personal data (hereinafter referred to as «Subjects of Personal data»), measures aimed at the Personal data protection, as well as procedures aimed at detecting and preventing any violations of the legislation of the Russian Federation in the handling of Personal data of the Company's Clients.

The present Statement has been developed in accordance with Federal law No. 152-FL «On Personal data» of July 27, 2006 (hereinafter referred to as «Federal law «On Personal data»»), Federal law No. 149-FL «On information, information technologies and information protection» of July 27, 2006, The Russian Federation Government Resolution No. 1119 of November 1, 2012 «On approval of requirements for Personal data protection when processing it in Personal data information systems», and other regulatory legal acts which regulate the procedure of working with Personal data.

The processing of Personal data by the Operator is carried out in compliance with the principles and conditions which are provided by the present Statement and the legislation of the Russian Federation in the field of Personal data.

2. General terms used in the Statement:

- Client – a natural person – the hotel guest, the hotel service customer, the consumer, the subject of Personal data;
- Hotel services – the activities of the Hotel related to the accommodation of Clients, as well as any other activity related to accommodation and staying at the Hotel, which includes basic and additional services provided to the Client;
- Operator – the person, who organizes and (or) carries out processing of Personal data, as well as determines the purpose of processing Personal data, the composition of Personal data to be processed, actions (operations) which are performed with Personal data and does these actions in an independent way or together with other persons;
- Personal data – the information which is stored in any format and related to a specific or an identifiable natural person (subject of Personal data), which allows to identify the Client's identity by itself or in combination with other information available to the Hotel;
- Other data - any information that does not allow you to establish your identity or is not directly related to a certain person;

- Processing of Personal data – any action (operation) or set of actions (operations) which are performed with or without the use of automation tools with Personal data, including collection, recording, systematization, accumulation, storage, clarification (update, change), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction, as well as provision of Personal data to the authorized body in the field of migration and other state regulatory authorities of the Russian Federation;
- Automated processing of Personal data – the processing of Personal data with computer technology's usage;
- Information system of Personal data – the set of Personal data databases and information technologies and technical means which ensures their processing;
- Provision of Personal data – the actions aimed at disclosure of Personal data to a certain person or a certain circle of persons;
- Trans-border transfer of Personal data – the transfer of Personal data to a foreign state authority, a foreign individual or a foreign legal entity on the territory of a foreign state;
- Use of Personal data – the actions (operations) with Personal data which are performed by the operator for the purpose of making decisions or performing any other actions that generate the legal consequences for the subject of Personal data or other persons or otherwise affect the rights and freedoms of the subject of Personal data or other persons.

3. Purposes of Personal data processing

The Clients' Personal data can be processed for the following purposes:

- making room reservations (booking);
- providing goods and services;
- studying customers' needs;
- establishing feedback;
- sending administrative information, special offers, promotions, and customer satisfaction surveys;
- implementing the following aspects of our business such as data analysis, audit, security, monitoring and prevention of frauds (including through the use of video surveillance systems, key cards and other security systems), developing new products, expanding, improving or changing our Services, identifying trends in network resources' usage, determining the effectiveness of our advertising campaigns, as well as implementing and expanding our activities.

The operator is not allowed processing of Personal data which is incompatible with the specified purposes.

Personal data cannot be used for the purpose of causing property and moral harm to citizens, hindering the implementation of the rights and freedoms of citizens.

4. Collection of Personal data

The volume and content of the processed Personal data strictly correspond to the stated processing goals and is not excessive in relation to the processing goals.

The Client's Personal data which are collected, processed and stored by the company includes:

- last name, first name, middle name (if available) of the Client;
- gender;
- date, month, year and place of birth;
- information on citizenship;
- type, series, number of the identity document, name of the authority that issued it, date of issue. Visa data and other identification data which are contained in identity cards;
- credit or debit card number or other payment details;
- language(s) of communication;
- address of registration and address of actual residence;
- contact phone number;
- email address;
- other data that we receive from third parties that we deal with (for example, travel agents and similar service providers);
- information about your stay, including the names of hotels where you stayed in, dates of arrivals and departures, purchased goods and services, special requests, information about your preferences in relation to the service (including the types of rooms, facilities, preferred types of rests, requested amenities, age of children and any other data regarding the Services you use).

Both our service providers and we may receive Personal data in various ways, including the following:

- Using Online services: when booking or purchasing products or services from us in any other way, communicating with us via online chats or social networks, informing us of your special requests or preferences, subscribing to newsletters, or participating in surveys, contests or promotions, as well as when planning events.
- Collecting information at the hotel;
- From other sources: public databases, cooperative marketing partners, and other third parties. This may be information from a travel agent, airline, credit card Issuer, and other partners, as well as from social networks (including people whom you have friendly or other relationships with). For example: if you use Online services by entering your account information in one of the social networks, some Personal data related to this account will be transferred to us, including Personal data specified in your profile or in your friends' profiles.
- From owners and franchisors of the MIRROS brand (the information about your stays, payment and service preferences in particular).

5. Other Personal data

When using the services of the Hotel's website, the Operator also processes other depersonalized data that is automatically transmitted during the use of the site through the software which are installed on the computer of an individual (subject of Personal data):

- the information about the browser, device or other program which is used to access the site;
- IP address;
- demographic data and other information provided by you
- the information which was collected using cookies, pixel tags, and other technologies;
- generalized information

If we are required by law to store and process Other data in the same way as Personal data, we have the right to use it for the same purposes which we use and disclose Personal data for.

Both our third-party service providers and we may collect Other data in various ways, including:

- With the help of your browser or device;
- Using cookies;
- Using pixel tags and other similar technologies;
- Using Adobe Flash technology;
- IP address;
- Third-party services;
- Third-party advertisers.

6. Processing of Personal data

The processing of the Client's Personal data is carried out by receiving personal data directly from the Client or from the person who is authorized by the client to transmit it.

- The Hotel staff has the right to check the accuracy and the relevance of the Personal data which was provided.
- In order to achieve the set goals, the Processing of Clients' Personal data consists of the following possible actions: collection, recording, systematization, accumulation, storage, clarification (update, change), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction, as well as provision of Personal data to the authorized body in the field of migration and other state regulatory bodies of the Russian Federation.
- The processing of Clients' Personal data is carried out using automation tools by mechanical and manual methods.
- Only the employees of the Company who are authorized to work with Clients' Personal data and have signed the Agreement on non-disclosure of Personal data can have access to the processing of Clients' Personal data.

- In order to comply with the requirements of the current legislation of the Russian Federation in the field of migration policy, the Hotel transfers Clients' Personal data to the migration service offices (FMS) in compliance with the Personal data protection standards.
- The hotel does not transfer Clients' Personal data to third parties without the consent of the subject of Personal data, unless otherwise is provided by Federal law.

7. Protection and storage of Personal data

The storage of Personal data which are fixed on paper carriers is carried out in accordance with Federal law No. 125-FL «On Archival Affairs in the Russian Federation» and other regulatory legal acts in the field of archival affairs and archival storage.

- The operator respects the confidentiality of Personal data, takes legal, organizational and technical measures to protect Personal data from unauthorized or accidental access to them, as well as from destruction, modification, blocking, copying, distribution of Personal data and from other illegal actions.
- The operator has notified the authorized body which is responsible for the processing of subject's Personal data in accordance with the requirements established by the Federal law «On Personal data».
- In case of detection of illegal actions with Personal data, the operator is obliged to eliminate the violation within three working days from the date of such detection occurred. The operator must notify the subject of Personal data about the elimination of violations.
- The operator takes all necessary organizational, technical and administrative measures to protect Personal data within the company. Unfortunately, none of the existing data transmission and storage systems provides 100% protection of information. If you have reason to believe that the security of the data you transmit to us is no longer guaranteed, immediately notify us at the addresses which are listed in the «Contact information» section below.
 - We ask you do not send or disclose any of your confidential Personal data (for example, social security numbers, national identity card numbers, racial or national identity, political views, religious or other beliefs, health, biometric or genetic characteristics, criminal record, or membership in trade unions) to us without a request from our side, either through the Services or through any other means.
- Please note that we may store certain data for the purpose of keeping records and / or completing transactions that you initiated prior to requesting a change or deletion of data (for example, if you make a purchase | booking or participate in a promotion, you may not change or delete the Personal data which was provided to us until the relevant purchase | booking or promotion is completed). Our databases and other repositories may contain residual information that will not be deleted. In addition, due to legal requirements and for security or other reasons, we will not be able to provide you with particular data.

- We will store your Personal data for the period of time which will be necessary to achieve the purposes listed in this Privacy Statement, unless a longer storage period is not provided by the law.

8. Disclosure of Personal data

Your Personal data may be disclosed in connection with the following services that we provide as the hotel operator:

- The personal information you provide when booking is disclosed to the relevant hotel in order to meet your booking request. The relevant hotel may be owned and managed by MIRROS HOTELS GROUP or by third parties as well.
- We may disclose your personal information to other companies that are parts of the MIRROS HOTELS GROUP for the purposes which were described in this Privacy Statement, such as providing you with services related to your stay at one of our hotels and sending you promotional messages which match your preferences.
- We may disclose Personal data to our third-party service providers which provide specific services such as restaurant service at our hotels, website hosting, data analysis, payment processing, order fulfillment, information technology and related infrastructure, customer service, email delivery, audit and other services.
- We may disclose your Personal information to franchisees in connection with the use of the Services, including information related to room bookings at our hotels.
- Organizers of lotteries, contests and other promotions.
- We may disclose your Personal data to third parties in case of reorganization, merger, sale, joint venture, assignment, transfer or any other actions with all or certain divisions, assets or shares of our company (including in case of bankruptcy or similar procedures proceeding).
- We may also use and disclose Personal data to the extent we deem it necessary or appropriate in the following cases: in accordance with applicable law, including the laws which are actual outside the country of your residence; to execute any legal proceedings; to meet requests from public authorities, including those one which are located outside the country of your residence; to ensure compliance with our terms and conditions; to protect our activities or those ones of our affiliated companies; to protect our rights, confidential information, security or property and/or the same things which concern our affiliated companies, you or third parties, as well as to provide us with the opportunity to use any means for legal protection which are available to us or any means for limitation of the damages that we may suffer from.

9. Transmission of Personal and Other data abroad

MIRROS HOTELS GROUP is a Russian Hotel operator that provides services all over the world. The transmission of information abroad is a necessary condition for the operation of Services which allows Clients to enjoy a consistently high level of service in any part of the world.

According to the current legislation, the operator has the right to transmit Personal and Other data which were collected through the Services to the relevant organizations in those countries where the standards of information protection may differ from the ones which were adopted in the country of your residence.

10. Updating of this Privacy Statement

The operator has the right to make changes to this Privacy Statement. Any changes will take effect after the updated Privacy Statement is published through the Online services. Using the Services after making the appropriate changes means that you accept the latest version of the privacy Statement.

This Statement is written in Russian and English languages. The Russian language version will overrule in case of any discrepancies between the Russian and English versions of this Privacy Statement are found out.

11. Contact information

Please contact us if you want to check, correct, update, hide or delete any Personal data you previously provided to us.

Management company:

[125284, Moscow, Leningradsky Ave, 31, bld.3](#)

+7 (495) 150 28 10

mhg@mirros-hotels.com

AGREEMENT TO THE PROCESSING OF PERSONAL DATA

The user gives his/her agreement to the Limited Liability Company «MIRROS HOTELS GROUP» (LLC «MIRROS HOTELS GROUP») (ITN 7719482571), which is located at the legal address 125284, Moscow, Leningradsky Avenue, 31, building 3, to process his/her personal data with the following conditions:

1. This Agreement is given to the processing of Personal data both without the use of automation tools and with their use as well;
2. The agreement is given to the processing of my Personal data specified in paragraph 4 of the Privacy Statement of MIRROS HOTELS GROUP;
3. The basis for processing of Personal data are: Federal law No. 152-FL of July 27, 2006 «On personal data» of July 27, 2006 (hereinafter referred to as «Federal law «On personal data»»), Federal law No. 149-FL of July 27, 2006 «On information, information technologies and information protection», The Russian Federation Government Resolution of November 1, 2012 No. 1119 «On approval of requirements for Personal data protection when processing it in Personal data information systems», and other regulatory legal acts which regulate the procedure of working with personal data;
4. Personal data is not publicly available;

During the processing of personal data, the following actions may be executed: collection, recording, systematization, accumulation, storage, clarification (update, change), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction, as well as provision of personal data to the authorized body in the field of migration and other state regulatory authorities of the Russian Federation;

5. Processing of Personal data may be terminated at the request of the subject of Personal data or his/her representative;
6. The storage of the Personal data which are fixed on paper carriers is carried out in accordance with Federal law No. 125-FL «On Archival Affairs in the Russian Federation» and other regulatory legal acts in the field of archival affairs and archival storage.
7. In case the subject of Personal data or his/her representative withdraws the agreement to the processing of Personal data, LLC «MIRROS HOTELS GROUP» has the right to continue processing Personal data without the agreement of the subject of Personal data if there are basis specified in paragraphs 2-11 of article 6, part 2 of article 10, and part 2 of article 11 of Federal law No. 152-FL «On personal data» of 27.07.2006.