Personal Data Processing Policy

1. General provisions

This personal data processing policy has been compiled in accordance with the requirements of Federal Law No. 152-FZ dated 27.07.2006 "On Personal Data" (hereinafter referred to as the Personal Data Law) and defines the procedure for processing personal data and measures to ensure the security of personal data taken by CHULKOVO RESORT LIMITED LIABILITY COMPANY (hereinafter referred to as the Operator).

1.1. The Operator sets as its most important goal and condition for the implementation of its activities the observance of human and civil rights and freedoms when processing his personal data, including the protection of the rights to privacy, personal and family secrets.

1.2. This Operator's policy regarding the processing of personal data (hereinafter referred to as the Policy) applies to all information that the Operator can receive about website visitors. https://chulkovoresort.ru /.

2. Basic concepts used in the Policy

2.1. Automated personal data processing is the processing of personal data using computer technology.

2.2. Blocking of personal data is the temporary termination of the processing of personal data (except in cases where the processing is necessary to clarify personal data).

2.3. A website is a collection of graphic and informational materials, as well as computer programs and databases that ensure their availability on the Internet at a network address https://chulkovoresort.ru /.

2.4. Personal data information system is a set of personal data contained in databases and information technologies and technical means that ensure their processing.

2.5. Depersonalization of personal data — actions as a result of which it is impossible to determine without using additional information whether personal data belongs to a specific User or another personal data subject.

2.6. Personal data processing is any action (operation) or set of actions (operations) performed with or without the use of automation tools with personal data, including collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, and destruction of personal data.

2.7. Operator — a state body, municipal body, legal entity or individual who independently or jointly with other persons organize and/or process personal data, as well as determine the purposes of personal data processing, the composition of personal data to be processed, actions (operations) performed with personal data.

2.8. Personal data — any information related directly or indirectly to a specific or identifiable User of the Website https://chulkovoresort.ru /.

2.9. Personal data authorized by the personal data subject for dissemination is personal data to which an unlimited number of persons have access by the personal data subject by giving consent to the processing of personal data authorized by the personal data subject for dissemination in accordance with the procedure provided for by the Personal Data Act (hereinafter referred to as personal data authorized for Dissemination).

2.10. User — any visitor to the website https://chulkovoresort.ru /.

2.11. Provision of personal data — actions aimed at disclosing personal data to a certain person or a certain circle of persons.

2.12. Dissemination of personal data — any actions aimed at disclosing personal data to an indefinite circle of persons (transfer of personal data) or at familiarizing with personal data of an unlimited number of persons, including the publication of personal data in the media, posting in information and telecommunications networks or providing access to personal data in any other way.

2.13. Cross—border transfer of personal data is the transfer of personal data to the territory of a foreign state to an authority of a foreign state, a foreign individual or a foreign legal entity.

2.14. Destruction of personal data — any actions as a result of which personal data is permanently destroyed with the impossibility of further restoration of the content of personal data in the personal data information system and/or the material carriers of personal data are destroyed.

3. Basic rights and obligations of the Operator

3.1. The Operator has the right to:

— receive reliable information and/or documents containing personal data from the personal data subject;

— if the personal data subject withdraws consent to the processing of personal data, as well as sending a request to terminate the processing of personal data, the Operator has the right to continue processing personal data without the consent of the personal data subject, provided there are grounds specified in the Law on Personal Data;

— independently determine the composition and list of measures necessary and sufficient to ensure the fulfillment of obligations stipulated by the Law on Personal Data and regulatory legal acts adopted in accordance with it, unless otherwise provided by the Law on Personal Data or other federal laws.

3.2. The Operator is obliged to:

— to provide the personal data subject, upon his request, with information regarding the processing of his personal data;

— organize the processing of personal data in accordance with the procedure established by the current legislation of the Russian Federation;

— respond to requests and requests from personal data subjects and their legal representatives in accordance with the requirements of the Personal Data Act;

— to provide the necessary information to the authorized body for the protection of the rights of personal data subjects at the request of this body within 10 days from the date of receipt of such request.;

— to publish or otherwise provide unrestricted access to this Personal Data Processing Policy;

— take legal, organizational and technical measures to protect personal data from unlawful or accidental access to them, destruction, modification, blocking, copying, provision, dissemination of personal data, as well as from other unlawful actions in relation to personal data;

— stop transmitting (distributing, providing, accessing) personal data, stop processing and destroy personal data in accordance with the procedure and cases provided for by the Law on Personal Data;

— perform other duties provided for by the Law on Personal Data.4. Основные права и обязанности субъектов персональных данных

4.1. Subjects of personal data have the right to:

— receive information regarding the processing of his personal data, except in cases provided for by federal laws. The information is provided to the personal data subject by the Operator in an accessible form, and it should not contain personal data related to other personal data subjects, except in cases where there are legitimate grounds for the disclosure of such personal data. The list of information and the procedure for obtaining it are established by the Law on Personal Data;

— require the operator to clarify his personal data, block or destroy them if the personal data is incomplete, outdated, inaccurate, illegally obtained or is not necessary for the stated purpose of processing, as well as take legally prescribed measures to protect their rights.;

— to put forward a condition of prior consent when processing personal data in order to promote goods, works and services on the market;

— to revoke consent to the processing of personal data, as well as to send a request to terminate the processing of personal data;

— to appeal to the authorized body for the protection of the rights of personal data subjects or in court against unlawful actions or omissions of the Operator during the processing of his personal data;

— to exercise other rights provided for by the legislation of the Russian Federation.

4.2. Subjects of personal data are obliged to:

— provide the Operator with reliable information about themselves;

— inform the Operator about the clarification (updating, modification) of their personal data.

4.3. Persons who have provided the Operator with false information about themselves or information about another personal data subject without the latter's consent are liable in accordance with the legislation of the Russian Federation.

5. Principles of personal data processing

5.1. Personal data is processed on a lawful and fair basis.

5.2. The processing of personal data is limited to the achievement of specific, predetermined and legitimate purposes. Processing of personal data incompatible with the purposes of personal data collection is not allowed.

5.3. It is not allowed to combine databases containing personal data, the processing of which is carried out for purposes incompatible with each other.

5.4. Processing is subject only to personal data that meet the purposes of their processing.

5.5. The content and volume of personal data processed correspond to the stated purposes of processing. Redundancy of the processed personal data in relation to the stated purposes of their processing is not allowed.

5.6. When processing personal data, the accuracy of personal data, its sufficiency, and, if necessary, its relevance to the purposes of personal data processing are ensured. The Operator takes the necessary measures and/or ensures that they are taken to delete or clarify incomplete or inaccurate data.

5.7. Personal data is stored in a form that makes it possible to determine the subject of personal data, no longer than the purposes of personal data processing require, unless the period of personal data storage is established by federal law, an agreement to which the personal data subject is a party, beneficiary or guarantor. The personal data being processed is destroyed or depersonalized upon achievement of the processing objectives or in case of loss of the need to achieve these objectives, unless otherwise provided by federal law.

6. Purposes of personal data processing

The purpose of processing is to collect and analyze reviews on the site, inform the User by sending emails.

Personal data • last name, first name, patronymic

• email address

Legal grounds • statutory (constituent) documents of the Operator

Types of personal data processing • Collection, recording, systematization, accumulation, storage, destruction and depersonalization of personal data

• Sending information letters to an email address

7. Conditions of personal data processing

7.1. The processing of personal data is carried out with the consent of the personal data subject to the processing of his personal data.

7.2. The processing of personal data is necessary to achieve the goals stipulated by an international agreement of the Russian Federation or a law, to carry out the functions, powers and duties assigned to the operator by the legislation of the Russian Federation.

7.3. The processing of personal data is necessary for the administration of justice, the execution of a judicial act, an act of another body or official subject to execution in accordance with the legislation of the Russian Federation on enforcement proceedings.

7.4. The processing of personal data is necessary for the performance of an agreement to which the personal data subject is a party or beneficiary or guarantor, as well as for the conclusion of an agreement on the initiative of the personal data subject or an agreement under which the personal data subject will be the beneficiary or guarantor.

7.5. The processing of personal data is necessary to exercise the rights and legitimate interests of the operator or third parties, or to achieve socially significant goals, provided that the rights and freedoms of the personal data subject are not violated.

7.6. Personal data is processed, access to which is provided to an unlimited number of persons by the personal data subject or at his request (hereinafter referred to as publicly available personal data).

7.7. Personal data subject to publication or mandatory disclosure is processed in accordance with federal law.

8. Procedure for the collection, storage, transfer and other types of personal data processing

The security of personal data processed by the Operator is ensured through the implementation of legal, organizational and technical measures necessary to fully comply with the requirements of current legislation in the field of personal data protection.

8.1. The Operator ensures the safety of personal data and takes all possible measures to exclude access to personal data of unauthorized persons.

8.2. The User's personal data will never, under any circumstances, be transferred to third parties, except in cases related to the implementation of current legislation or if the personal data subject consents to the Operator to transfer data to a third party to fulfill obligations under a civil contract.

8.3. In case of inaccuracies in personal data, the User can update them independently by sending a notification to the Operator's e-mail address.

apenshin@gmail.com 8.4. The period of personal data processing is determined by the achievement of the purposes for which the personal data was collected, unless another period is stipulated by the contract or applicable legislation.

The User can revoke his consent to the processing of personal data at any time by sending an e-mail notification to the Operator.

8.4 Operators apenshin@gmail.com

8.5. All information collected by third-party services, including payment systems, communication facilities and other service providers, is stored and processed by these persons (Operators) in

accordance with their User Agreement and Privacy Policy. The subject of personal data and/or with the specified documents. The Operator is not responsible for the actions of third parties, including the service providers specified in this paragraph.

8.6. The prohibitions established by the personal data subject on the transfer (other than granting access), as well as on the processing or conditions of processing (other than gaining access) of personal data permitted for distribution, do not apply in cases of personal data processing in the state, public and other public interests defined by the legislation of the Russian Federation.

8.7. When processing personal data, the Operator ensures the confidentiality of personal data.

8.8. The Operator stores personal data in a form that allows determining the subject of personal data for no longer than is required for the purposes of processing personal data, unless the period of storage of personal data is established by federal law, an agreement to which the personal data subject is a party, beneficiary or guarantor.

8.9. The condition for termination of personal data processing may be the achievement of the purposes of personal data processing, the expiration of the consent of the personal data subject, the withdrawal of consent by the personal data subject or the requirement to terminate the processing of personal data, as well as the identification of unlawful processing of personal data.

9**. List of actions performed by the Operator with the received personal data**

9.1. The Operator collects, records, systematizes, accumulates, stores, clarifies (updates, changes), extracts, uses, transfers (distributes, provides, accesses), depersonalizes, blocks, deletes and destroys personal data.

9.2. The Operator performs automated processing of personal data with or without receiving and/or transmitting the information received via information and telecommunication networks.

10. Cross-border transfer of personal data

10.1. Prior to the start of activities on the cross-border transfer of personal data, the Operator is obliged to notify the authorized body for the protection of the rights of personal data subjects of its intention to carry out cross-border transfer of personal data (such notification is sent separately from the notification of the intention to process personal data).

10.2. Prior to submitting the above notification, the Operator is obliged to obtain relevant information from the authorities of a foreign state, foreign individuals, and foreign legal entities to whom the cross-border transfer of personal data is planned.

11. Confidentiality of personal data

The operator and other persons who have obtained access to personal data are obliged not to disclose or distribute personal data to third parties without the consent of the personal data subject, unless otherwise provided by federal law.

12. Final provisions

12.1. The User can receive any clarifications on issues of interest related to the processing of his personal data by contacting the Operator via e-mail. apenshin@gmail.com

12.2. Any changes to the Operator's personal data processing policy will be reflected in this document. The policy is valid indefinitely until it is replaced by a new version.

12.3. The current version of the Policy is freely available on the Internet at https://chulkovoresort.ru /.