

PERSONAL DATA PROCESSING AND PROTECTION POLICY

1.1. The Policy of processing and protection of personal data (hereinafter referred to as the Policy) has been developed by Art. 18.1 of the Federal Law of 27.07.2006 N 152-FZ "On Personal Data" (hereinafter referred to as the Law on Personal Data) and is the fundamental internal regulatory document of the Limited Liability Company "Ar Travel" (hereinafter also referred to as the Operator, Organization), which determines the key areas of its activities in the field of processing and protection of personal data that the organization can receive from the subject of personal data (website user, tourist or another customer who is a party to contractual relations related to the sale of a tourist product and the provision of tourist services that are part of the tourist product).

1.2. The Policy applies to clients of the Organization and users of online services provided by the Organization, including:

- customers of a tourist product - a tourist or other person ordering a tourist product on behalf of a tourist, including a legal representative of a minor tourist, or under the terms of which the tourist is a Beneficiary, provided that the customer has provided the Operator with grounds for the legality of his actions in someone else's interest (see. Clause 1, 8, Article 9 of the Law "On Personal Data").
- tourist - an individual visiting a country (place) of temporary stay in medical, recreational, recreational, educational, physical culture, sports, professional, business, religious, and other purposes without engaging in activities related to obtaining income from sources in the country (place) of temporary stay for a period from 24 hours to 6 months in a row or carrying out at least one overnight stay in the country (place) of temporary stay;
- individuals who are in civil law relations with the Company.
- a user of the Ar Travel LLC website (hereinafter referred to as the User) - a person who has access to the Ar Travel LLC website via the Internet and uses the information, materials, and products of the Ar Travel LLC website.

1.2.1. If the subject of personal data submits an application for employment at Ar Travel LLC or is already in labor relations with the Organization (employee), this Policy is not applicable.

1.3. The policy was developed to implement the requirements of the legislation in the field of processing and protection of personal data and is aimed at ensuring the protection of the rights and freedoms of a person and citizen when processing his personal data by the Operator, including the protection of the rights to privacy, personal and family secrets.

1.4. This policy regarding the processing and protection of personal data by the Operator is characterized by the following features:

1.4.1. Discloses the main categories of personal data processed by the Operator, the goals, methods, and principles of processing personal data by the Operator, the rights and obligations of the Operator when processing personal data, the rights of subjects of personal data, and also includes a list of measures used by the Operator to ensure the security of personal data during their processing.

1.4.2. It is a publicly available document that declares the conceptual foundations of the Operator's activities in the processing of personal data.

1.5. The provisions of the Policy apply to the relationship for the processing and protection of personal data received by the Operator both before and after the approval of the Policy, except for cases when, for legal, organizational, and other reasons, the provisions of the Policy cannot be extended to the relationship for the processing and protection of personal data received before its approval.

1.6. The use of the Ar Travel LLC website by the User constitutes acceptance of this Policy.

1.7. In case of disagreement with the terms of the Policy, the User must stop using the Ar Travel LLC website.

1.8. This Privacy Policy applies, among other things, to the website of Ar Travel LLC. Ar Travel LLC does not control and is not responsible for third-party sites to which the User can click on the links available on the Ar Travel LLC website.

1.9. The operator does not verify the accuracy of the personal data provided by customers.

2. BASIC CONCEPTS

2.1. For this Policy, the following basic concepts are used:

2.1.1. personal data - any information relating directly or indirectly to a specific or identifiable individual (subject of personal data) (clause 1 of article 3 of the Federal Law of July 27, 2006, N 152-FZ);

2.1.2. processing of personal data - any action (operation) or a set of actions (operations) performed using automation tools or without using such tools with personal data, including collection, recording, systematization, accumulation, storage, clarification (update, change), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data (clause 3, article 3 of the Federal Law of 27.07.2006 N 152-FZ);

2.1.3. distribution of personal data - actions aimed at disclosing personal data to an indefinite circle of persons (clause 5 of article 3 of the Federal Law of July 27, 2006, N 152-FZ);

2.1.4. provision of personal data - actions aimed at disclosing personal data to a certain person or a certain circle of persons (clause 6 of article 3 of the Federal Law of July 27, 2006, N 152-FZ);

2.1.5. blocking of personal data - temporary termination of the processing of personal data (except for cases where processing is necessary to clarify personal data) (clause 7 of article 3 of the Federal Law of July 27, 2006, N 152-FZ);

2.1.6. destruction of personal data - actions as a result of which it becomes impossible to restore the content of personal data in the personal data information system and (or) as a result of which tangible carriers of personal data are destroyed (clause 8 of article 3 of the Federal Law of 27.07.2006 N 152-FZ) ;

2.1.7. depersonalization of personal data - actions as a result of which it becomes impossible to determine the ownership of personal data to a specific subject without using additional information (clause 9 of article 3 of the Federal Law of July 27, 2006, N 152-FZ);

2.1.8. information - information (messages, data) regardless of the form of their presentation;

2.1.9. documented information - information recorded on a material medium by documenting information with requisites that make it possible to determine such information or its material medium;

2.1.10. cross-border transfer of personal data - the transfer of personal data to the territory of a foreign state to foreign state authority, a foreign individual, or legal entity (clause 11, article 3 of the Federal Law of July 27, 2006, N 152-FZ).

2.1.11. information system of personal data - a set of personal data contained in databases and information technologies and technical means that ensure their processing.

2.1.12. The Operator's website is a collection of interconnected web pages located on the Internet at a unique address (URL): <https://acrossrussia.travel>, as well as its subdomains.

2.1.13. Cookies are a small piece of data sent by a web server and stored on the user's computer, which the web client or web browser sends to the web server each time in an HTTP request when trying to open the page of the corresponding site.

2.1.14. An IP address is a unique network address of a node in a computer network through which the User gains access to the website of Ar Travel LLC.

3. PURPOSES OF PERSONAL DATA PROCESSING

3.1. The operator processes personal data solely for the following purposes:

3.1.1. Conclusion by the Operator and fulfillment of obligations under contracts of a civil nature, including those related to the fulfillment of obligations under contracts for the sale of a tourist product, and ensuring the provision of services that are part of the sold tourist product;

3.1.2. Providing the client, with his consent, with information about special offers, newsletters, and other information on behalf of the Operator.

3.1.3. Provision by the Operator to the client of the services specified in the offers on the official website of the Operator in the information and telecommunications network "Internet";

3.1.4. Improving the quality of the services provided by the Operator, analytics of the client's actions on the site;

3.1.5. Autocomplete forms when placing orders;

3.1.6. Establishing feedback with the client, including sending notifications, inquiries regarding the use of the site, processing inquiries and requests from the client.

4. RIGHTS OF THE PERSONAL DATA SUBJECT AND OBLIGATIONS OF THE OPERATOR

4.1. The subject of personal data has the right to receive information about the processing of his personal data by the Operator, including:

- confirmation of the fact of processing of personal data by the Operator;
- legal grounds and purposes of personal data processing;
- the purposes and methods of processing personal data used by the operator;
- the name and location of the operator, information about persons (except for the Operator's employees) who have access to personal data or to whom personal data may be disclosed based on an agreement with the Operator or based on federal law;
- processed personal data relating to the relevant subject of personal data, the source of their receipt, unless another procedure for submitting such data is provided for by federal law;
- terms of processing personal data, including the terms of their storage;
- the procedure for the exercise by the subject of personal data of the rights provided for by the legislation on the protection of personal data;
- information about the carried out or about the intended cross-border data transfer;
- other information provided by the legislation on the protection of personal data;

4.2. The subject of personal data has the right to demand from the Operator, who processes them, to clarify these personal data, to block or destroy them if they are incomplete, outdated, inaccurate, illegally obtained, or cannot be deemed necessary for the stated purpose of processing, as well as to accept the provided the law measures to protect their rights.

4.3. The right of the subject of personal data to access his personal data may be limited following federal laws, including in the following cases:

4.3.1. The processing of personal data, including those obtained as a result of an operational search, counterintelligence, and intelligence activities, is carried out to strengthen the country's defense, ensure the security of the state and protect law and order.

4.3.2. Provided that the processing of personal data is carried out by the authorities that detained the subject of personal data on suspicion of committing a crime, or charged the subject of personal data in a criminal case, or applied a preventive measure to the subject of personal data before being charged, except for those provided for by criminal procedural legislation Of the Russian Federation, when it is allowed to familiarize the suspect or the accused with such personal data.

4.3.3. If the processing of personal data is carried out following the legislation on combating the legalization (laundering) of proceeds from crime and the financing of terrorism.

4.3.4. When the access of the subject of personal data to his personal data violates the rights and legitimate interests of third parties.

4.3.5. If the processing of personal data is carried out in the cases provided for by the legislation of the Russian Federation on transport security, to ensure the stable and safe operation of the transport complex, to protect the interests of the individual, society, and the state in the field of the transport complex from acts of unlawful interference.

4.4. To exercise his rights and protect legitimate interests, the subject of personal data has the right to contact the Operator. The operator considers any appeals and complaints from the subjects of personal data, thoroughly investigates the facts of violations, and takes all necessary measures to immediately eliminate them, punish the perpetrators and resolve disputes and conflict situations out of court.

4.5. The subject of personal data has the right to appeal against the actions or inaction of the Operator by contacting the authorized body for the protection of the rights of subjects of personal data.

4.6. The subject of personal data has the right to protect his rights and legitimate interests, including compensation for damages and/or compensation for moral damage in court.

4.7. When processing the personal data of the subject, the operator is obliged to comply with the following general requirements:

4.7.1. The processing of the personal data of the subject can be carried out exclusively for the purposes specified in section 3 of this Policy.

4.7.2. The operator is obliged to receive personal data from the subject personally. If the personal data of the subject can only be obtained from a third party, then the subject must be notified of this in advance and written consent must be obtained from him. The operator is obliged to inform the subjects about the purposes, the alleged sources and methods of obtaining personal data, as well as about the nature of the personal data to be received, about the list of actions that the Operator intends to perform with personal data, about the period during which the consent of the subject of personal data to the processing of personal data is valid. data; on the procedure for withdrawing consent to the processing of personal data and the consequences of the subject's refusal to give written consent to their receipt and processing.

4.7.3. The operator has no right to receive and process personal data about race, nationality, political views, religious or philosophical beliefs, health status, intimate life, except as otherwise provided by law. In particular, he has the right to process the specified personal data of the subject only with his written consent.

4.7.4. The operator is obliged to provide the subject or his representative with information on the availability of personal data relating to the relevant subject of personal data, as well as provide the opportunity to familiarize themselves with them when the subject of personal data or his representative applies, or within 30 (thirty) days from the date of receipt of the request from the subject of personal data or his representative.

4.7.5. The storage and protection of the personal data of the subject from their unlawful use or loss are provided by the Operator at his expense.

4.7.5.1. Personal data of subjects of personal data can be received, undergo further processing, and transferred to storage, both on paper and in electronic form.

4.7.5.2. It is not allowed to store and place documents containing personal data in open electronic catalogs (file sharing services) in personal data information systems.

4.7.5.3. The storage of personal data in a form that makes it possible to determine the subject of personal data is carried out no longer than the purpose of their processing requires, and they are subject to destruction upon achievement of the processing goals or in case of loss of the need to achieve them.

4.7.5.4. The personal data of personal data subjects processed using automation tools are processed and stored in compliance with the requirements established by the Decree of the Government of the Russian Federation No. 1119 "On approval of requirements for the protection of personal data when processing them in personal data information systems" dated 01.11.2012.

4.7.6. In case of revealing inaccurate personal data or illegal actions with them by the Operator when contacting or at the request of the subject or the authorized body for the protection of the rights of subjects of personal data, the Operator is obliged to block personal data for the period of verification.

4.7.7. In case of confirmation of the fact of the personal data inaccuracy, the Operator based on documents submitted by the subject or the authorized body for the protection of the rights of subjects of personal data, or other necessary documents, is obliged to clarify the personal data and remove their blocking.

4.7.8. If the purpose of processing personal data is achieved, the Operator is obliged to immediately stop processing personal data and destroy the relevant personal data within a period not exceeding 3 (three) working days, and notify the subject about this, and if an appeal or request was sent by an authorized body for protection of the rights of subjects of personal data, also the specified authority.

4.7.9. If the subject withdraws consent to the processing of his personal data, the Operator is obliged to stop processing personal data and destroy personal data within a period not exceeding three working days, unless otherwise provided by an agreement between the Operator and the subject. The Operator is obliged to notify the subject about the destruction of personal data.

4.7.10. The operator transfers personal data to third parties in the following cases:

- a written consent has been received from the subject of personal data for such actions;
- the transfer is provided for by Russian or other applicable law within the framework of the procedure established by law.

4.7.11. Third parties to whom personal data is transferred as part of the fulfillment of obligations related to the implementation and performance of tourist services that are part of the tourist product:

- tour operators that form the tourist product;
- direct performers of tourist services that are part of a tourist product, or providing individual tourist services (accommodation facilities, carriers, insurance companies, consulates, and embassies of foreign states that issue visas, excursion bureaus, etc.).

Cross-border transfer of personal data is carried out taking into account the requirements established by Article 12 of the Federal Law No. 152-FZ "On Personal Data" dated July 27, 2006.

4.7.12. When collecting personal data, including through the information and telecommunication network "Internet", the Operator provides recording, systematization, accumulation, storage, clarification (updating, modification), extraction of personal data of citizens of the Russian Federation using databases located in the territory of the Russian Federation, except cases stipulated by the current legislation;

5. VOLUME AND CATEGORIES OF PROCESSED PERSONAL DATA, THE ORDER OF THEIR PROCESSING

5.1. The following categories of personal data are processed in the information systems of the Operator's personal data:

5.1.1. Personal data of clients of Ar Travel LLC (individuals, legal entities), representatives of clients (individuals and legal entities). The volume of processed personal data: up to 100 subjects of personal data.

5.2. The list of personal data of clients (customers and tourists) processed in the personal data information systems of Ar Travel LLC, in the amount necessary for booking tourist services that are part of a tourist product sold under agreements on the sale of a tourist product, as well as in the amount necessary for the registration of tourist documents confirming the right of tourists to receive tourist services that are part of the tourist product:

- Full Name;
- phone number;
- Email;
- gender;
- the photo;
- residence address;
- registration address;
- Bank details;
- city and country of birth;
- Date of Birth;
- details of the identity document of both a passport of a citizen of the Russian Federation and a foreign passport (series, number, by whom and when issued, validity period);
- document type;
- citizenship;
- information about past deportations from the Russian Federation or other violations of the legislation of the Russian Federation;
- statistical data;
- visa number;
- details contained in copies of documents: a certificate from a medical institution, a certificate from an airport medical center (airport signal sheet), a certificate of incapacity for work, an extract from medical history, an extract from a hospital, an extract from an ambulance call log;
- birth certificate (for underage tourists);
- cookies,
- OS type and version;
- browser type and version;
- the type of device and its screen resolution;
- the source from where the User came to the site, from which site or for which advertising;
- OS and browser language;

- what actions the client takes on the Site;
- IP-address.
- other information about the client that he reports about himself in connection with the peculiarities of the trip he is planning, or in connection with the requirements for information about the client for considering the issue of issuing a visa, or by insurance companies in the interests of agreeing, the beneficiary of which is the client.

5.3. The list of personal data of clients (site users; users who applied through the feedback form; users who completed the survey; customers of the services specified in the offers on the official website of the Operator) processed in the personal data information systems of Ar Travel LLC:

- Full Name;
- phone number;
- Email;
- photograph (if necessary);
- place of residence (if necessary);
- cookies,
- OS type and version;
- browser type and version;
- the type of device and its screen resolution;
- the source from where the User came to the site, from which site or for which advertising;
- OS and browser language;
- what actions the client takes on the Site;
- IP-address.

5.4. When processing personal data, the Operator performs the following actions with personal data: collection, recording, systematization, accumulation, storage, clarification (update, change), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data. The processing of personal data is carried out both with the use of automation tools and without the use of automation tools.

5.5. Disabling cookies may result in the inability to access parts of the site that require authorization.

5.6. The site collects statistics about the IP addresses of its visitors. This information is used to prevent, detect and solve technical problems.

5.7. The conditions for terminating the processing of personal data are:

- 5.7.1. Expiration of the consent of the subject of personal data to the processing of personal data or withdrawal by the subject of this consent;
- 5.7.2. Achievement by the Operator of the purposes of processing personal data;
- 5.7.3. Identification of illegal processing of personal data, as well as inaccuracy of personal data.

5.8. Personal data are subject to destruction in the following cases (unless otherwise provided by an agreement between the subject of personal data and the Operator):

- 5.8.1. Achievement by the Operator of the purposes of processing personal data;
- 5.8.2. Revocation by the subject of personal data of consent to the processing of personal data.

6. LEGAL BASIS FOR PROCESSING PERSONAL DATA

6.1. The Operator's policy in the field of personal data processing is determined following the following regulatory legal acts of the Russian Federation:

- 6.1.1. The Constitution of the Russian Federation;
- 6.1.2. Federal Law No. 149 of July 27, 2006 "On Information, Information Technologies and Information Protection";
- 6.1.3. The Civil Code of the Russian Federation;
- 6.1.4. Federal Law No. 160-FZ of 19.12.2005 "On Ratification of the Council of Europe Convention for the Protection of Individuals concerning Automated Processing of Personal Data";
- 6.1.5. Order of the FSTEC of Russia No. 21 dated February 18, 2013 "On approval of the composition and content of organizational and technical measures to ensure the security of personal data during their processing in personal data information systems."
- 6.1.6. Decree of the Government of the Russian Federation of 01.11.2012 No. 1119 "On approval of requirements for the protection of personal data during their processing in personal data information systems";
- 6.1.7. Federal Law of 27.07.2006 N 152-FZ "On Personal Data";

7. THE LIST OF THE MEANS AND METHODS OF INFORMATION PROTECTION USED BY THE ORGANIZATION WHEN PROCESSING PERSONAL DATA

7.1. When processing personal data, the operator takes all the necessary legal, organizational, and technical measures to protect them from unauthorized or accidental access, destruction, modification, blocking, copying, provision, distribution, as well as from other illegal actions concerning them. Personal data protection is a strictly regulated process that prevents violations of the availability, integrity, reliability, and confidentiality of personal data and ensures sufficiently reliable information security in the course of the Operator's activities. Ensuring the security of personal data is achieved, in particular, in the following ways:

- 7.1.1. Appointment of those responsible for organizing the processing of personal data.
- 7.1.2. Implementation of internal control and/or audit of the compliance of personal data processing with the Federal Law of July 27, 2006, No. 152-FZ "On Personal Data" and the regulatory legal acts adopted following it, the requirements for the protection of personal data, local acts.
- 7.1.3. Familiarization of the Operator's employees who directly process personal data with the provisions of the legislation of the Russian Federation on personal data, including the requirements for the protection of personal data, local acts concerning the processing of personal data.
- 7.1.4. Determination of threats to the security of personal data during their processing in personal data information systems.
- 7.1.5. The application of organizational and technical measures to ensure the security of personal data during their processing in personal data information systems, necessary to meet the requirements for the protection of personal data.
- 7.1.6. Evaluating the effectiveness of measures taken to ensure the security of personal data before the commissioning of the personal data information system.
- 7.1.7. By taking into account the machine carriers of personal data.
- 7.1.8. Revealing facts of unauthorized access to personal data and taking appropriate measures.
- 7.1.9. Recovery of personal data modified or destroyed due to unauthorized access to them.

7.1.10. Establishing rules for accessing personal data processed in personal data information systems, as well as ensuring registration and accounting of all actions performed with personal data in personal data information systems.

7.1.11. Control over the measures taken to ensure the security of personal data and the level of protection of information systems of personal data.

7.1.12. The duties of officials who process and protect personal data, as well as their responsibility, are determined in the official regulations of the above persons.

7.1.13. Certified anti-virus software with regularly updated databases.

8. FINAL PROVISIONS

8.1. For all issues that have not found their solution in this Policy, the Operator and the subjects of personal data processed by the Operator are guided by the provisions of Federal Law No. 152-Φ3 dated July 27, 2006 "On Personal Data" and by-laws governing the procedure for working with personal data and their protection.

8.2. The operator has the right to make changes to this Policy. The new version of the Policy comes into force from the moment it is posted on the Operator's website unless otherwise provided by the new version of the Policy.

8.3. The law of the Russian Federation shall apply to this Policy and the relationship between the subjects of personal data and the Operator.

8.4. Feedback:

- e-mail address: go@acrossrussia.travel;
- mailing address: 115088, PO Box 127.