

## **The Privacy Policy regarding to the processing and protection of personal data**

This Privacy Policy regarding the processing and protection of personal data (hereinafter - the Privacy Policy) applies to all information that the site of "Individual Tourist Service" Ltd. - [www.its.com.ru](http://www.its.com.ru), (hereinafter - the site of the Tour Operator) can receive from the User during the use of this site.

### **1. General Provisions.**

1.1. The purpose of this website is to ensure the protection of the rights and freedoms of users when processing their personal data, including the protection of privacy rights, personal and family secrets.

1.2. The Privacy Policy sets the obligations of the Site Administration to not disclose and protect the confidentiality of personal data that the User provides while using the site of the Tour Operator.

1.3. The security of personal data is understood as the protection of personal data from unauthorized or accidental access, destruction, modification, blocking, copying, provision, dissemination of personal data, as well as other illegal actions in relation to personal data.

1.4. Processing and ensuring the security of personal data is carried out in accordance with the Constitution of the Russian Federation, the Federal Law No. 152-FZ "On Personal Data" (July 27, 2006) and other regulatory legal acts of the Russian Federation with regard to the processing of personal data.

1.5. Principles of processing personal data:

- Legality, fairness and validity;
- Limiting the processing of personal data to the achievement of specific objectives for which the relevant data are provided;
- Preventing the processing of personal data for purposes not related to the collection of personal data;
- Processing of personal data in accordance with certain purposes.

1.6. The Privacy Policy is a public document and contains information that can be disclosed in accordance with Art. 14 of Federal Law No. 152-FZ "On Personal Data".

1.7. Information about the Tour Operator: 190000, St. Petersburg, Malaya Morskaya str., 17 A, office 8-H.

1.8. Use of the site of the Tour Operator means that the User completely agrees with this Privacy Policy.

1.9. In the case of disagreement with the terms of this Privacy Policy, the User must stop using the site of the Tour Operator.

1.10. The Tour Operator does not check the authenticity of the personal data provided by the User. The user is fully responsible for providing incomplete and incorrect personal data.

1.11. The user is entitled to:

- obtain personal data relating to this subject and information regarding their processing;
- clarification, blocking or destruction of his personal data in case they are incomplete, outdated, inaccurate, illegally obtained or not necessary for the stated purpose of processing;
- withdraw consent to the processing of personal data;
- protection of his rights and legitimate interests, including compensation for damages and moral harm in the courts;
- appeal against the actions or inactivity of the Tour Operator in court.

## **2. The subject of the Privacy Policy.**

2.1. The personal data of the User is an information required by the Tour Operator in connection with civil and other legal relationships and relating to a specific subject of personal data.

2.2. Personal data of the User, authorized for processing under this Privacy Policy is:

- Surname, name of the User;
- Series and passport number;
- Time and place of issue of the passport;
- Series and number of the foreign passport;
- The expiry date of the foreign passport;
- Date of Birth;
- User's contact phone numbers;
- E-mail address;
- Registration address and residence of the User;
- Other mandatory information relating to the subject of personal data.

2.3. The information listed in paragraph 2.2. of the Privacy Policy contains information about the User's personal data and is absolutely confidential. The Tour Operator ensures the confidentiality of personal data, and is obliged not to allow their distribution without the consent of the User, or the presence of other legal grounds. The consent of the User is expressed in the use of the website of the Tour Operator.

2.4. The Tour Operator has the right to transfer the personal data of the User and other persons specified in the application to a third party in the amount necessary to fulfill obligations within the framework of civil legal relations.

## **3. Methods and terms of processing personal information**

3.1. Personal data processing activities include collection, recording, systematization, accumulation, storage, updating, extraction, use, transmission (distribution, provision, access), depersonalization, blocking, deletion and destruction.

3.2. Terms of processing of the User's personal data are determined in accordance with the term of validity of the contractual legal relationship with the User and the limitation period.

3.3. The personal data of the User can be transferred to the authorized bodies of the government of the Russian Federation only based on the legislation of the Russian Federation.

3.4. The Tour Operator takes necessary organizational and technical measures to protect the User's personal information from unauthorized or accidental access, destruction, modification, blocking, copying, distribution, as well as from other illegal actions of third parties.

#### **4. Obligations of the parties.**

4.1. The User is obliged:

4.1.1. To provide full information about their personal data, as well as information about the personal data of other persons indicated in the application, necessary for using the site of the Tour Operator.

4.1.2. When providing personal data of third parties, the User must obtain a written consent to the processing of their personal data from them.

4.1.3. To update and supplement the provided information about personal data in case of its change.

#### **4.2. The Tour Operator is obliged:**

4.2.1. To use the received information about the personal data of the User and other persons indicated in the application only for the purposes specified in Section 2 of this Privacy Policy.

4.2.2. To ensure that confidential information is kept in secret, not to sell, exchange, publish, or disclose in other possible ways the personal data of the User.

4.2.3. Take precautions to protect the privacy of the User's personal data in accordance with the procedure normally used to protect this kind of information.

4.2.4. To remove personal data related to the relevant User from the moment of request of the User or his legal representative or competent authorities responsible for protection of the rights of subjects of personal data for the verification period, in case of revealing unreliable personal data or illegal actions.

#### **5. Responsibility of the parties**

5.1. The Tour Operator is liable under the laws of the Russian Federation.

5.2. In case of loss or disclosure of confidential information, the Tour Operator is not responsible if this confidential information:

5.2.1. Became public property before its loss or disclosure.

5.2.2. It was received by third parties until it was received by the Tour Operator.

5.2.3. It was disclosed with the consent of the User.

## **6. Dispute resolution**

6.1. This Privacy Policy provides for a mandatory written pre-trial dispute resolution procedure.

6.2. Claims are considered within thirty calendar days from the receipt of the relevant demand.

6.3. If the dispute is not resolved in a pre-trial order, then the parties are entitled to apply to the judicial authority in accordance with the legislation of the Russian Federation.

6.4. The legislation of the Russian Federation is applied to this Privacy Policy and legal relations arising between the User and the Tour Operator.

## **7. Additional conditions**

7.1. The Tour Operator has the right to make changes to this Privacy Policy without the consent of the User.

7.2. The new Privacy Policy comes into effect from the moment of posting on the website of the Tour Operator, unless otherwise provided by the new edition of the Privacy Policy.