

APPROVED by the order of Profi.Travel (LLC) dated 12.07.2017, No 2/2

The company policies with respect to personal data processing

Profi.Travel (LLC) acknowledges the importance of information confidentiality. This document states our obligations with respect to the personal information provided by you.

We recommend you to read these security policies and possible amendments thereto from time to time.

1. GENERAL PROVISIONS

1.1. The personal data processing policies (the “Policies”) have been developed pursuant to the Federal Law dated 27.07.2006, No 152-FZ, “On personal data” (the “FZ-152 Law”), and the Directive of data protection (95/46/EC) of the European parliament and EC Council.

1.2. These Policies shall outline the procedure for personal data processing and measures to ensure the security of personal data in Profi.Travel (the “Operator”), in order to protect rights and freedoms of an individual and citizen at processing of his/her personal data, including the protection of rights of privacy, personal or family secret.

1.3. The Policies use the main concepts below:

— **Automated personal data processing** means personal data processing with the use of computers;

— **Personal data blocking** means a temporary cessation of personal data processing (except for the events when the processing is required for specification of personal data):

— **Information system of personal data** means the totality of personal data contained in data bases, information technologies and technical means providing the processing thereof.

— **Personal data depersonalization** means actions as a result whereof it becomes impossible to attribute personal data to a particular personal data subject without additional information.

— **Personal data processing** means any action (transaction) or the totality of actions (transactions) performed with personal data with or without the use of automation means, including collection, recording, systematization, accumulation, storage, specification (updating, changing), retrieval, use, transmission (dissemination, provision, access), depersonalization, blocking, deletion, and destruction of the personal data;

— **Operator** means a state authority, municipal body, legal entity or individual who arranges and/or carries out personal data processing either on one’s own or jointly with other persons, and determines the goals of personal data processing, structure of the personal data to be processed, actions (transactions) to be performed with personal data;

— **Personal data** means any information directly or indirectly relating to a certain or identifiable individual (personal data subject);

— **Personal data provision** means actions aimed at personal data disclosure to a certain person or a certain scope of persons;

— **Personal data dissemination** means actions aimed at disclosure of personal data to an indefinite range of persons (personal data communication) or study of the personal data by an indefinite range of persons, including personal data promulgation in mass media, placement thereof in information or telecommunication networks or provision of access to personal data in any other way.

— **Cross-Border communication of personal data** means the communication of personal data to the territory of a foreign state to an authority of the foreign state, individual or legal entity of the foreign state.

— **Personal data destruction** means actions resulting in impossibility to restore the content of

personal data in an information system of personal data and/or destruction of tangible media of personal data.

1.4. The company shall be bound to publish or provide unrestricted access to these Policies of personal data processing in any other way, pursuant to Article 18.1, Part 2, of FZ-152 Law.

2. PRINCIPLES AND TERMS OF PERSONAL DATA PROCESSING

2.1. Principles of personal data processing

2.1.1. The Operator shall process personal data on the basis of principles below:

- Legality and equitable basis;
- Restriction of personal data processing with achievement of particular legal purposes determined in advance;
- Avoidance of personal data processing incompatible with the goals of personal data collection;
- Avoidance of unification of data bases containing personal data which is processed for the goals incompatible with each other;
- Processing of only that personal data which meets the goals of processing thereof;
- Conformity of the content and volume of personal data processed to the processing goals stated;
- Inadmissibility of personal data processing in excess of the stated goals of processing of such data;
- Provision of accuracy, sufficiency, and actuality of personal data with respect to the personal data processing goals;
- Destruction or depersonalization of personal data upon the achievement of goals of processing thereof or in the event of no further need to achieve them, where the Operator is unable to remediate violations of personal data, unless otherwise envisaged by the federal law.

2.2. Conditions and goals of personal data processing

2.2.1. The Operator shall process personal data when at least one of the conditions below is met:

- Personal data is processed with consent of a personal data subject to the processing of one's personal data;
- Personal data processing is required for the achievement of goals envisaged by an international treaty of the Russian Federation or the law for implementation and performance of functions, powers, and duties imposed by the Russian Law on an operator;
- Personal data processing is required for the delivery of justice, performance of a judicial ruling, regulation of any other authority or officer subject to performance pursuant to the Russian Law on enforcement proceedings;
- Personal data processing is required for the performance of an agreement with a personal data subject being a party thereto or a beneficiary thereof, or a surety thereunder, and for entry into of an agreement at the initiative of the personal data subject or an agreement whereunder the personal data subject will be a beneficiary or surety;
- Personal data processing is required for exercising rights and legitimate interests of the Operator or third parties, or for the achievement of publicly important goals, provided that no rights or freedoms of the personal data subject are violated in that event;
- The processing of personal data is undertaken, where the access to such data is provided by the personal data subject or at his/her request to an unlimited scope of persons (the 'generally

accessible personal data”);

— Processing of personal data to be published or necessarily disclosed pursuant to the federal law.

— Personal data processing is required for the provision of services or information. LLC Profi.Travel may send publications and marketing information of our products and services, and monitor your interest therein (You may unsubscribe from the mailout via your personal account or by emailing a request to info@ptofi.travel).

2.3. Personal data confidentiality

2.3.1. The Operator or other persons who gained access to personal data shall be bound to refrain from disclosing to third parties or disseminating personal data without consent of a personal data subject, unless otherwise envisaged by the federal law.

2.4. Generally accessible sources of personal data

2.4.1. For the purpose of data intelligence, the Operator may create generally accessible sources of personal data of subjects thereof. The generally accessible sources of personal data may include, with consent in writing of a personal data subject, one’s last name, first name, father’s name, position, email or other personal data communicated by the personal data subject.

2.4.2. Information of a personal data subject should be removed from the generally accessible sources of personal data at any time upon request of the personal data subject, authorized body on protection of rights of personal data subjects or by court order.

2.5. Instruction of personal data processing to another party

2.5.1. The Operator shall be entitled to instruct the personal data processing to another party with consent of a personal data subject, unless otherwise envisaged by the federal law, under an agreement to be entered into with that party. The party processing personal data on instruction of the Operator shall comply with the principles and rules of personal data processing envisaged by FZ-152 Law and these Policies.

2.6. Processing of personal data of Russian Federation citizens

2.6.1. In accordance with Article 2 of the Federal Law dated July 21, 2014, No 242-FZ, “On amendments to certain legal regulations of the Russian Federation as pertains to the specification of procedures for personal data processing in information and telecommunication networks”, when collecting personal data, including through the “Internet” information and telecommunication network, an operator shall be bound to provide recording, systematization, accumulation, storage, specification (updating, alteration), and retrieval of personal data of Russian Federation citizens using data bases located in the Russian Federation, except when:

— Personal data processing is required for the achievement of goals envisaged by an international treaty of the Russian Federation or the law for implementation and performance of functions, powers, and duties imposed by the Russian Law on an operator;

— Personal data processing is required for the delivery of justice, performance of a judicial ruling, regulation of any other authority or officer subject to performance pursuant to the Russian Law on enforcement proceedings (“judicial ruling performance”);

— Personal data processing is required for the exercise of powers of federal executive authorities, bodies of state extra-budgetary funds, executive state authorities of Russian Federation constituents, local government bodies, or functions of the organizations participating in provision of the respective state and municipal services envisaged by the Federal Law of July

27, 2010, No 210-FZ, “On organization of provision of state and municipal services”, including registration of a personal data subject in the unified portal of state and municipal services and/or regional portals of state and municipal services;

— Personal data processing is required for carrying out professional activities of a journalist and/or legal activities of a mass medium, or scientific, literary or other creative activities, provided that no rights or legitimate interest of a personal data subject are violated.

2.7. Cross-border communication of personal data

2.7.1. The Operator shall be bound to make sure that the foreign state whereto it is purported to communicate personal data provides adequate protection of rights of personal data subjects, before the beginning of such communication.

2.7.2. A cross-border communication of personal data to the territory of foreign states which do not provide any adequate protection of rights of personal data subjects may be effected where:

— Consent in writing of a personal data subject to the cross-border communication of one’s personal data is available;

— An agreement is performed, a party whereto is a personal data subject.

2.8. The Operator shall collect the following personal data: first name and last name, contact information, including email and IP-address; country and city; place of work and position.

2.9 Using of cookies

2.9.1. What are cookies and what for LLC Profi.Travel uses them

Cookies are small text files located on a device which you use for accessing profi.travel web-site (the “Web-site”). They contain information which is collected from your device and sent back to the Web-site at each subsequent visit thereof, in order to remember your actions and preferences at the lapse of time.

The following types of cookies are used in the Web-site:

- Strictly necessary cookies/technical cookies: these cookies are required for the Web-site operation and provision of services to you; inter alia, they allow to identify your hardware and software, including your browser type;
- Statistical / analytical cookies: these cookies allow to identify users, count their number, and collect information, such as your transactions in the Web-site, including the information of web-pages visited by you and content which you receive;
- Technical cookies: these cookies collect information of how users interact with the Web-site and/or services which allows to identify errors and test new functions for enhancing the productivity of the Web-site and services;
- Functional cookies: these cookies allow to provide certain functions, in order to simplify the use of the Web-site by you, for example, by saving your preferences (such as language or location);
- (Third party) tracing files / advertising cookies: these cookies collect information of users, traffic sources, visited pages, and ads shown for you, as well as the ads whereon you switched over to an advertized page. They allow to show ads which may be of interest for you on the basis of analysis of the Personal information collected of you. They are also used for statistical and research purposes.

2.9.2. LLC Profi.Travel uses information contained in cookies only for the purposes above, whereafter the collected data will be stored in your device for a period which may depend on the

relevant type of cookies, but no longer than it is required for the achievement of their goal, and then they will be automatically deleted from your system.

2.9.3. During the first visit to the Web-site, your consent to using cookies may be requested. If you want to change your decision after you have approved the use of cookies, you may do so by deleting cookies stored in your browser (usually you can do that in browser settings – please use the guide for working with the browser or the web-site of its writers). If you refuse from using cookies, this may result in unavailability of some Web-site functions for you, and affect the possibility to use the Web-site. You can also change the settings of your browser, in order to accept or deny all cookies by default.

2.10 Information collected in the web-site

When you visit the web-site we may collect the data below about you: name, email, and IP-address. Besides, we are entitled to record statistical information, for example, the date and time of visit, number of pages viewed, in order to access the productivity and usefulness of our web-site.

3. RIGHTS OF A PERSONAL DATA SUBJECT

3.1. Consent of a personal data subject to the processing of one's personal data

3.1.1. A personal data subject shall make a decision of providing one's personal data and consent to the processing thereof in a free manner, by one's will, and pursuing one's own benefit. The personal data processing may be consented to by a personal data subject or one's representative in any form which allows evidencing the fact of its receipt, unless otherwise envisaged by the federal law.

3.2. Rights of a personal data subject

3.2.1. A personal data subject shall be entitled to receive from the Operator information relating to the processing of one's personal data, if such entitlement is not restricted pursuant to the federal laws. A personal data subject shall be entitled to demand from the Operator to specify one's personal data, to block or destroy it, if the personal data is incomplete, obsolete, inaccurate, or illegally obtained, or is not required for the stated purpose of processing, and to take steps for protecting one's rights, as envisaged by the law.

3.2.2. Personal data processing for the promotion of goods, works or services in the market by direct contacts with a personal data subject (potential consumer) using the communication means and for political agitation shall only be allowed if prior consent of the personal data subject is available.

3.2.3. The Operator shall be bound to immediately stop the processing of one's personal data for the purposes above at request of a personal data subject.

3.2.4. It shall be prohibited to make decisions engendering legal consequences with respect to a personal data subject or otherwise affecting one's rights and legal interests on the basis of automated processing of personal data only, except for the cases envisaged by federal laws, and provided that consent in writing of the personal data subject is available.

3.2.5. Where a personal data subject considers that the Operator processes one's personal data in violation of FZ-152 Law or otherwise violates one's rights and freedoms, the personal data subject may appeal against the actions or omission of the Operator to the Authorized body for

protection of rights of personal data subjects or to court.

4. PROVISION OF PERSONAL DATA SECURITY

4.1. The security of personal data to be processed by the Operator shall be provided by implementation of legal, organizational, and technical measures required for the measure compliance with the federal laws pertaining to the personal data protection.

4.2. In order to prevent unauthorized access to personal data, the Operator shall take the organizational and technical measures below:

- Appointment of officers responsible for the organization of personal data processing and protection;
- Limitation of a scope of persons admitted to personal data processing;
- Familiarization of subjects with requirements of the federal laws and legal regulations of the Operator on processing and protection of personal data;
- Organization of accounting, storage, and handling of media containing personal data;
- Identification of threats to the personal data security at processing thereof; building of threat models on the basis thereof;
- Development of a personal data protection system on the basis of the threat model;
- Using of information protection means which underwent the procedure for assessment of the compliance with the Russian Law pertaining to the information security provision, where the application of such means is required for counteracting immediate threats;
- Check of fit and efficiency of using the information protection means;
- Control of user access to information resources, soft- and hardware means for information processing;
- Registration and accounting of personal data information system user activity;
- Using of antivirus means and tools for personal data system recovery;
- Application, when needed, of means for firewalling, intrusion detection, protectability analysis, and cryptographic protection tools;
- Organization of pass control at the Operator's site, protection of premises using technical means for personal data processing.

5. DATA STORAGE TIME FRAMES

We store your information only within a period required for the achievement of goals wherefor such information is collected and processed or (if the applicable law envisages a longer retention period) within a required statutory storage period. After the expiry of that period your Personal data is deleted, blocked, or anonymized, as envisaged by the applicable law. In particular:

5.1. If you delete your Account, your Personal data shall be marked for deletion, except when legal requirements or other prevailing legal purposes require a longer storage period.

5.2. If you revoke your consent to the processing of your Personal data, we delete your Personal data processed for the purpose which you object against, unless other legal basis for processing and storage of that data is available or storage of that data is required pursuant to the applicable law.

6. FINAL PROVISIONS

6.1. Other rights and duties of the Operator in connection with the personal data processing shall

be outlined by the Russian Law pertaining to personal data.

6.2. Operator's employees violating the provisions governing the processing and protection of personal data shall incur financial, disciplinary, administrative, civil law, or criminal liability as envisaged by the federal laws.

6.3. We may review these Confidentiality Policies from time to time with account of changes in our business, Web-sites, Services or the law. The amended Confidentiality Policies will be in effect starting from the published effective date. If the amended version includes a material change, we will inform you thereof on page <http://profi.travel/legal> of our web-site. We may also inform Users of changes via email or other channels.