Approved by
General Director
Lecco LLC
A.G. Shevchenko
May 27, 2025

Privacy Policy of the Lecco Hotel Website

This Privacy Policy of the website https://lecco-hotel.ru/ (hereinafter referred to as the "Policy") of Lecco Hotel (hereinafter the "Hotel") is developed in accordance with the provisions of the Constitution of the Russian Federation, Federal Law No. 149-FZ dated July 27, 2006 "On Information, Information Technologies and Information Protection," Federal Law No. 152-FZ dated July 27, 2006 "On Personal Data" (hereinafter the "Personal Data Law"), and other regulatory legal acts governing the protection and processing of personal data effective within the territory of the Russian Federation. This Policy applies to all information that Limited Liability Company "Lecco" (TIN 5029118100) (hereinafter the "Operator") may obtain about the user during their use of the website https://lecco-hotel.ru/.

1. DEFINITIONS

1.1. The following terms are used in this Privacy Policy:
1.1.1. "Website Administration" — authorized employees of the Operator managing the website on its behalf, organizing and/or performing the processing of personal data, as well as determining the purposes of processing, the composition of personal data subject to processing, and the actions (operations) performed with personal data.
1.1.2. LLC "Lecco" — the owner of the website, the Company, the Operator, Lecco Hotel, responsible for processing personal data (TIN 5029118100, PSRN 1085029007634, registered address: 141021, Moscow Region, Mytishchi Urban District, Mytishchi, Letnaya St., 32).
1.1.3. "Personal Data" — any information relating directly or indirectly to an identified or identifiable individual (personal data subject).
1.1.4. "Processing of Personal Data" — any action or set of actions 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), anonymization, blocking, deletion, destruction of personal data.
1.1.5. "Confidentiality of Personal Data" — a mandatory requirement for the Website Administration to prevent dissemination of personal data without the consent of the personal data subject or other lawful grounds.
1.1.6. "Website" — a set of programs for electronic computing machines and other information contained in the information system accessible via the Internet at https://lecco-hotel.ru/.
1.1.7. "Website User" (hereinafter the "User") — a person who has access to the Website via the Internet and uses the Website for their purposes.
1.1.8. "Cookies" — a fragment of data sent by a web server and stored on the User's computer, which the web client or browser sends back to the web server in an HTTP request each time the User attempts to open a page of the corresponding website.
1.1.9. "IP Address" — a unique network address of a node in a computer network built on the IP protocol.

2. GENERAL PROVISIONS

2.1. This Privacy Policy establishes the procedure for collecting, recording, processing, accumulating, using, disseminating, and storing personal data of personal data subjects and guarantees the confidentiality of information about Website Users who have provided their personal data to LLC "Lecco."
2.2. The category of personal data subjects includes Website Users.

2.3. The purpose of this Privacy Policy is to protect the personal data of Website Users from unauthorized access and disclosure. Personal data of Website Users is confidential and strictly protected information.
2.4. Use of the Website by the User constitutes consent to this Privacy Policy and the terms of processing the User's personal data, and pursuant to paragraph 3 of Article 6 of Federal Law No. 152-FZ dated July 27, 2006 "On Personal Data," grants the Operator consent to delegate the processing of personal data to LLC "Travel Line Systems" (TIN 1215180595, PSRN 1141215003214, registered address: 424003, Republic of Mari El, Yoshkar-Ola, Lenin Ave., 56, building A), the rights holder of the TravelLine online booking module posted on the Website (hereinafter the "TravelLine Booking Module").
2.5. Should the User refuse to provide their personal data, the Website Administration does not guarantee the technical capability to independently book accommodation and/or receive personalized offers.
2.6. This Privacy Policy applies exclusively to this Website. The Website Administration does not control and is not responsible for third-party websites that the User may access via links available on this Website.
2.7. The Website Administration does not verify the accuracy of personal data provided by the User and cannot assess the User's legal capacity but assumes that the User provides accurate personal information.
2.8. This Privacy Policy is posted on the Lecco Hotel website and is publicly accessible to all Website Users.

3. **SUBJECT OF THE PRIVACY POLICY**

3.1. This Privacy Policy sets forth the Website Administration's obligations to maintain confidentiality of personal data provided by the User upon various requests from the Website Administration for purposes outlined in this Policy (e.g., registration, booking, subscription to notifications, etc.), as well as defines the policy regarding personal data processing and contains information on the implemented personal data protection requirements.
3.2. Personal data subject to processing under this Policy is provided by the User by completing special forms on the Website via the TravelLine Booking Module and includes the following information (general categories of personal data):

- Full name (surname, first name, patronymic);
- Citizenship;
- Gender;
- Residential address (postal code; region, republic, territory; city, locality);
- Identity document details (series, number);
- User's phone number;
- Email address;
- Payment data;
- Data of guests for whom the User is a legal representative and/or who will stay with the User in the room;
- IP address;
- Time zone;
- Name and version of the internet browser;
- Language settings;
- Name and version of the operating system (when booking via computer) or device characteristics and settings (when booking via smartphone or tablet).

3.3. To improve the booking process and make it more convenient and faster, the TravelLine Booking Module collects cookies. Users can choose which cookies to accept or reject in the "Help" section of their browser.
3.4. The above-mentioned and any other personal information not specified here but made known to the Website Administration by the User is subject to this Privacy Policy.

4. PURPOSES OF PERSONAL DATA PROCESSING

4.1. Personal data specified in clause 3.2 is used for purposes related to the interaction between the personal data subject and the Company, including but not limited to:
4.1.1. Identification of the Website User for concluding agreements on the provision of hotel and related services;
4.1.2. Establishing communication with the User, including sending notifications, confirmations, inquiries regarding service provision, status of User's orders or requests;
4.1.3. Verification of the accuracy and completeness of personal data provided by the User;
4.1.4. Processing and receipt of payments, disputing payments, determining eligibility for discounts;
4.1.5. Providing effective customer and technical support related to Website use;
4.1.6. Providing special offers, price information, newsletters, and other information with User's consent;
4.1.7. Quality control of services provided by Lecco Hotel and/or its partners.

5. METHODS AND TERMS OF PROCESSING AND STORAGE OF PERSONAL DATA

5.1. Processing and storage of User's personal data by the Company is carried out for two years from the end of the User's stay at the Hotel and may be revoked at any time by sending a request to gm@lecco-hotel.ru.
5.2. Personal data processing is performed by any lawful means, including information systems with or without the use of automation tools.
5.3. Personal data of Website Users is obtained from LLC "Travel Line Systems," the rights holder of the TravelLine Booking Engine. The Company may obtain personal data from other third parties only with the User's written consent or as otherwise provided by law.
5.4. The Company independently takes all necessary measures to comply with Federal Law No. 152-FZ "On Personal Data" and other regulatory acts governing personal data processing.
5.5. The Website Administration must take or ensure the adoption of appropriate legal, organizational, and technical measures to protect personal data from unauthorized or accidental access, destruction, alteration, blocking, copying, provision, dissemination, and other unlawful acts.
5.6. The Company bears full responsibility for protecting personal data obtained during Website use and independently requests consent for processing personal data.
5.7. The Company may disclose personal data without User consent if required by authorized government authorities in accordance with applicable law.

6. MEASURES TO PROTECT PERSONAL DATA

6.1. The Website Administration ensures, at its own expense, the protection of personal data from unauthorized use or loss in accordance with Russian Federation legislation.
6.2. The Website Administration adopts measures necessary and sufficient to fulfill obligations under the Personal Data Law, including but not limited to:

- Appointment of a person responsible for organizing personal data processing;
- Issuance of documents defining the Website's personal data processing policy and internal regulations;
- Application of legal, organizational, and technical measures to ensure personal data security;
- Internal control or audit of compliance with personal data laws and policies;
- Training and familiarization of employees processing personal data with legal requirements and internal policies.

7. OBLIGATIONS OF THE PARTIES

7.1. The User undertakes to:
7.1.1. Provide accurate and truthful personal data necessary for Website use;
7.1.2. Update or supplement personal data if it changes;
7.1.3. Take measures to protect access to confidential data stored on the Website, including not disclosing login credentials to third parties.
7.2. The Website Administration undertakes to:
7.2.1. Use personal data solely for the purposes specified in clauses 4.1.1–4.1.7;
7.2.2. Not disclose personal data except as provided in clause 5.7;
7.2.3. Block personal data upon User's or authorized representative's request in case of inaccurate data or unlawful actions;
7.2.4. Destroy personal data in accordance with this Policy;
7.2.5. Provide information upon User's request as required by Russian law;
7.2.6. Take necessary measures to protect personal data from unlawful access or actions.

8. STORAGE, DESTRUCTION, AND BLOCKING OF PERSONAL DATA

8.1. Personal data transmitted via the TravelLine Booking Module is stored in the Company's personal data information system and at LLC "Travel Line Systems." Organizational and technical measures are applied to ensure data security and prevent unauthorized access.
8.2. Upon detection of unlawful processing, personal data is blocked during the investigation period.
8.3. In case of inaccurate data, personal data is blocked upon User's request during verification, provided that blocking does not violate rights and interests.
8.4. If inaccuracies are confirmed, personal data is corrected within seven working days and unblocked.
8.5. Unlawful processing detected by the Website Administration must cease within three working days.
8.6. If lawful processing cannot be ensured, personal data must be destroyed within ten working days.
8.7. The User is notified about violations or destruction of personal data.
8.8. In case of unlawful or accidental disclosure causing User rights violations, the Website Administration must notify the authorized personal data protection authority within 24 hours of the incident and provide details of the investigation within 72 hours.
8.9. Upon achievement of processing purposes, personal data is destroyed within 30 days.
8.10. Upon User's withdrawal of consent, processing ceases and data is destroyed within 30 days if no longer needed.
8.11. Upon User's request to stop processing, data processing ceases within 10 working days, except as required by law. This period may be extended by up to 5 working days with notification.
8.12. If destruction is not possible within the specified time, data is blocked and destroyed within six months unless otherwise required by law.
8.13. After storage periods expire or other legal grounds arise, personal data is destroyed.
8.14. Destruction methods:

- Paper documents are shredded;
- Electronic data is erased or physical media destroyed.

9. LIABILITY

9.1. The Website Administration is liable for unauthorized disclosure of User personal data under applicable law, except as provided in clauses 5.4, 5.7, and 9.2.1–9.2.3.
9.2. The Administration is not liable for loss or disclosure if:

9.2.1. The data was publicly available before loss or disclosure;
9.2.2. The data was received from a third party before the Administration obtained it;
9.2.3. Disclosure occurred with User's consent.
9.3. The User is responsible for the legality, accuracy, and truthfulness of the personal data provided.

10. DISPUTE RESOLUTION

10.1. Before filing a court claim, parties must present a written claim for voluntary dispute resolution.
10.2. The recipient must respond in writing within 30 calendar days.
10.3. If no agreement is reached, disputes are submitted to the competent court.
10.4. This Policy and relations between User and Website Administration are governed by applicable law.

11. ADDITIONAL TERMS

11.1. The Website Administration may unilaterally amend this Privacy Policy without User consent.
11.2. The new Policy becomes effective upon posting on the Website unless otherwise specified.