

Processing policy personal data

1. General provisions

This Personal data processing Policy is compiled in accordance with the requirements of Federal Law No. 152-FZ of 27.07.2006 "On Personal Data" (hereinafter referred to as the Law about personal data) and determines the procedure for processing personal data and measures to ensure the security of personal data taken by Grand Park LLC (hereinafter referred to as the Operator).

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

1.2. This policy of the Operator 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://royalbaltic.ru/>.

2. Basic concepts used in the Policy

2.1. Automated processing of personal data — processing of personal data using computer technology.

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

2.3. Website — a set of graphic and informational materials, as well as computer programs and databases that ensure their availability on the Internet via a network connection. address <https://royalbaltic.ru/>.

2.4. Personal data information system — 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 that make it impossible to determine whether personal data belongs to a specific User or other personal data subject without using additional information.

2.6. Processing of personal data — any action (operation) or a 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, or destruction of personal data.

2.7. Operator — a state body, municipal body, legal entity or individual that independently or jointly with other persons organizes and/or performs the processing of personal data, as well as determines the purposes of processing personal data, 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://royalbaltic.ru/> .

2.9. Personal data authorized for distribution by the personal data subject means personal data that an unlimited number of persons have access to by the personal data subject by giving consent to the processing of personal data authorized for distribution by the personal data subject in accordance with the procedure provided for by the Personal Data Law (hereinafter referred to as personal data authorized for Distribution).

2.10. User — any user of the website <https://royalbaltic.ru/> .

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

2.12. Dissemination of personal data — any actions aimed at disclosing personal data to an indefinite group of persons (transfer of personal data) or the right to get acquainted with the personal data of an unlimited number of persons, including the publication of personal data in the mass media, the placement of personal data on the Internet.
in information and telecommunication networks or providing access to personal data in any other way.

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

2.14. Destruction of personal data — any actions that result in the permanent destruction of personal data with the impossibility of further restoration of the content of personal data in the personal data information system and / or the destruction of material carriers of personal data.

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 sends a request to stop processing personal data, the Operator has the right to continue processing personal data without the consent of the personal data subject, if there are grounds specified in the Personal Data Law;
- 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 not provided for by the Personal Data Act or other federal laws.

3.2. The Operator must:

- provide the personal data subject, upon request, with information related to the processing of his / her 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 Law;
- inform the authorized body for the protection of the rights of personal data subjects at the request of this body of the necessary information within 10 days from the date of receipt of such request;
- publish or otherwise provide unrestricted access to this Personal Data Processing Policy;
- take legal, organizational and technical measures to protect personal data from unauthorized or accidental access to it, destruction, modification, blocking, copying, provision, dissemination of personal data, as well as from other illegal 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 stipulated by the Law on Personal Data.

4. Basic rights and obligations of personal data subjects

4.1. Subjects of personal data have the right to:

- receive information related to the processing of their personal data, with the exception of cases stipulated by federal laws. 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 legal grounds for disclosure of such personal data. The list of information and the procedure for obtaining it is established by the Law on Personal Data;
- require the operator to clarify their personal data, block or destroy them if the personal data is incomplete, outdated, inaccurate, illegally obtained or not necessary for the stated purpose of processing, as well as take measures provided for by law to protect their rights;
- set a condition for prior consent when processing personal data for the purpose of promoting goods, works and services on the market;
- to withdraw consent to the processing of personal data, as well as to send a request to terminate the processing of personal data;
- appeal to the authorized body for the protection of the rights of personal data subjects or in court against illegal actions or omissions of the Operator when processing their personal data;
- to exercise other rights stipulated by the legislation of the Russian Federation.

4.2. Subjects of personal data must:

- provide the Operator with reliable information about yourself.
- inform the Operator about updating (updating, changing) your 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. The processing of personal data is carried out on a legal and fair basis.

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

5.3. It is not allowed to combine databases containing personal data that are processed for purposes that are incompatible with each other.

5.4. Only personal data that meets the purposes of their processing are subject to processing.

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

5.6. When processing personal data, the accuracy of personal data, their sufficiency, and, if necessary, their relevance to the purposes of processing is ensured personal data. The Operator takes the necessary measures and / or ensures their adoption to delete or clarify incomplete or inaccurate data.

5.7. Storage of personal data is carried out in a form that makes it possible to determine the subject of personal data, no longer than the purposes of processing personal data require, unless the period of storage of personal data is established by a federal law, an agreement to which the subject of personal data is a party, beneficiary or guarantor. The processed personal data is destroyed or depersonalized upon reaching the processing goals, or if it is no longer necessary to achieve these goals, unless otherwise provided by federal law.

6. Purposes of personal data processing

Purpose of processing	conclusion, execution and termination of civil contracts, execution of orders
Personal data	• surname, first name, patronymic • email address • phone numbers • payment details (in an impersonal form, when processed through secure payment gateways) • data that is automatically transmitted during the use of the site (IP address, information from cookies, browser data, access time, address of the requested page)
Legal grounds	• Federal Law No. 149-FZ of 27.07.2006" On Information, Information Technologies and Information Protection"

Types of personal data processing	Collection, recording, systematization, accumulation, storage, destruction and depersonalization of personal data
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7. Terms 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 / her personal data.

7.2. The processing of personal data is necessary for achieving the goals stipulated by an international treaty of the Russian Federation or a law, for performing 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, or 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 a contract to which the personal data subject is a party or beneficiary or guarantor, as well as for the conclusion of a contract on the initiative of the personal data subject or a contract under which the personal data subject will be a 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. Processing of personal data is carried out, access to which is granted to an unlimited number of persons by the subject of personal data or at his request (hereinafter referred to as publicly available personal data).

7.7. Processing of personal data subject to publication or mandatory disclosure in accordance with federal law is carried out.

8. Procedure for collecting, storing, transmitting 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 perform the following tasks:
fully comply with the requirements of the current legislation in the field of personal data protection.

8.1. The Operator ensures the security of personal data and takes all possible measures that 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 has given consent to the Operator to transfer data to a third party for the performance of obligations under a civil contract.

8.3. If inaccuracies in personal data are identified, the User can update them independently by sending a notification to the Operator's email address reservation@royalbaltic.ru marked "Updating personal data".

8.4. The term of personal data processing is determined by the achievement of the purposes for which personal data was collected, unless another term is provided for by the contract or current legislation.

The User can withdraw their consent to the processing of personal data at any time by sending a notification to the Operator via email to the Operator's email address reservation@royalbaltic.ru marked "Revocation of consent to the processing of personal data".

8.5. All information collected by third-party services, including payment systems, means of communication and other service providers, is stored and processed by these persons (Operators) in accordance with their User Agreement and the 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 clause.

8.6. The prohibitions imposed by the personal data subject on the transfer (except for granting access), as well as on the processing or conditions for processing (except for obtaining access) of personal data allowed for distribution do not apply in cases of processing personal data 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 makes it possible to determine the subject of personal data, no longer than the purposes of processing personal data require, unless the period of storage of personal data is established by a federal law, an agreement to which the subject of personal data is a party, beneficiary or guarantor.

8.9. A 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 request to terminate the processing of personal data, as well as the identification of illegal 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, transmits (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 received information via information and telecommunications networks.

10. Cross-border transfer of personal data

10.1. 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 intent to process personal data) prior to performing cross-border transfer of personal data.

10.2. Before submitting the above-mentioned notification, the Operator is obliged to receive relevant information from the authorities of a foreign state, foreign individuals, and foreign legal entities to which 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 get any clarifications on the issues of interest related to the processing of their personal data by contacting the Operator via e-mail yandex. mail reservation@royalbaltic.ru.

12.2. This document will reflect any changes to the Operator's personal data processing policy. The policy is valid indefinitely until it is replaced with a new version.

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