

APPROVED
by General Manager's Order
No. 01 of 1.02.2025

**Confidentiality policy of
Domina Management LLC**

The City of St. Petersburg
2025

Оглавление

1. General provisions	3
2. Key terms	4
3. User's consent to the processing of personal data	4
4. Purposes of personal data processing	5
5. User's rights	5
6. Types of personal data collected subject to User consent	6
7. Operations with User's personal data	6
8. Information provided for User upon request	7
9. Communication with Operator	8
10. Appealing against Operator's acts or omissions	9
11. Term of User data processing	9
12. Measures of personal data protection	9

1. General provisions

- 1.1. This confidentiality Policy (hereinafter referred to as the “**Policy**”) has been developed by Domina Management LLC (ОГРН: 1227800138103, ИНН: 7838109182, located at 54 “А” Bolshaya Morskaya St., Office 406/2 Admiralteisky municipal district, the city of St. Petersburg, 190068) (hereinafter referred to as the “**Operator**”) in conformity with the Constitution of the Russian Federation (Article 30), the Civil Code of the Russian Federation (Articles 19, 21, 152.1, 152.2), Federal law No. 152-FZ “On Personal Data” of July 27, 2006 (hereinafter referred to as the “**Law on personal data**”) and other legal acts related to personal data protection, the Operator’s by-laws. The purpose of the Policy is to protect the rights of a subject of personal data when the Operator processes the personal data indicated by such an individual while using the Operator’s Website at <https://dominarewards.com>, its sub-domains, services and products (hereinafter referred to as the “**Website**”), as well as while interacting with the Operator by electronic mail, with the help of messengers and other means of communication.
- 1.2. The Policy regulates the processing and protecting of information about users (hereinafter referred to as a “**User**” or “**Users**”), as well as of any data that Users may leave on the Website.
- 1.3. The Operator shall process Users’ personal data in strict conformity with the principles of personal data processing indicated in Article 5 of the Law on personal data.
- 1.4. The scope of personal data, the purpose and methods of its use are indicated in Paragraphs 6 and 7 of the Policy.
- 1.5. This Policy has been approved in order to comply with the legislation in the field of personal data processing and security. It is aimed at openly informing Users about the data processing procedure, their rights and obligations while their personal data is processed by the Operator, as well as protecting User’s rights. The Policy is aimed at maintaining confidentiality regarding the processed User data.
- 1.6. This Policy covers all of the Users’ personal data processed by the Operator, whether with the help of computer technology or not.
- 1.7. This Policy is a publicly available document. The Policy has been posted by the Operator on the Website, and any individual using the Website is granted unrestricted access to the Policy.
- 1.8. The Operator has the right to amend the Policy without prior notification to the User by posting a new version of the Policy on the Website.
- 1.9. The Policy does not regulate the procedure for processing and protecting data in respect of other sites and web objects accessible through the Website or to which the Website contains a link. The Operator neither bears any responsibility for, nor provides any assurances about, the data that a User may leave on such sites.
- 1.10. The Policy shall come into force as of the moment of its being posted on the Website.

2. Key terms

- 2.1. **Personal data** is any information, which is, whether directly or indirectly, related to a User.
- 2.2. **A User** is a visitor to the Website who has provided their personal data to the Operator,

and/or an individual who is duly registered in the D Rewards loyalty programme.

- 2.3. **Partners** are legal entities, with whom the Operator has concluded agreements within the framework of the Program, under which Participants duly registered in the D Rewards loyalty Programme are given an opportunity to earn/deduct Bonus Points, as well as receiving other privileges.
- 2.4. **The D Rewards loyalty Programme** is a set of interrelated actions and activities aimed at increasing loyalty and enabling Participants to receive Bonus Points and use Privileges while paying for the Operator's services and those of its Partners. The Rules of the programme are available on the Website.
- 2.5. **Personal data processing** is any action (operation) or set of actions (operations), whether using information technology tools or not, with personal data, including collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, and destruction of personal data.
- 2.6. **Confidentiality of personal data** is a mandatory requirement for the Operator and its employees, as well as other persons who have gained access to Users' personal data, to prevent the circulation of such personal data without Users' consent or the presence of legitimate grounds.
- 2.7. **The circulation of personal data** are any actions aimed at the disclosure of personal data to an unidentified number of individuals or entities.
- 2.8. **The provision of personal data** are any actions aimed at the disclosure of personal data to an identified individual/entity or an identified group of individuals/entities.
- 2.9. **Cross-border personal data transfer** is an act of transferring personal data to the territory of a foreign country, a government body of a foreign country, a foreign individual or a foreign legal entity.

3. A User's consent to the processing of their personal data

- 3.1. A User decides to provide their personal data to the Operator freely, voluntarily and in their own interest. A User can give their consent either personally or through a representative.
- 3.2. By providing their personal data on the Website and pressing the button "*I agree with the terms of personal data processing...*" (or the button with the same statement with a link to the Policy), a User gives their consent to the processing of their personal data in the manner stipulated by the Policy.
- 3.3. If a User continues to use the Operator's Website, they give consent to the processing of "cookies" (see Paragraph 6.2.2 of the Policy).

4. Purposes of, and grounds for, personal data processing

- 4.1. The Operator shall process personal data exclusively to the following ends¹:
 - 4.1.1. Ensuring the implementation of the rules of D Rewards Loyalty programme and a

¹A User's personal data may be processed for purposes other than the indicated ones if it required by the legislation of the Russian Federation.

User's ability to use the Website's functionality, including the following:

- 4.1.1.1. The Registration, Identification of a User upon their use of the Website;
- 4.1.1.2. The creation of a User's personal account on the Website and granting such a User access to their personal account and other personalized resources of the Website;
- 4.1.1.3. The selection by the Operator of recommendations for accommodation based on a User's personal preferences indicated in such a User's personal account on the Operator's website;
- 4.1.1.4. The provision of technical support to a User in issues related to the use of the Website.
- 4.1.2. Ensuring the operability and security of the Website, improving its functionality, preventing computer attacks and other abuses, collecting and processing statistical data, analyzing information about User interaction with the Website;
- 4.1.3. Informing a User about the Operator's services, sending a User information, advertising materials, and newsletters.
- 4.2. Personal data is processed for the above-mentioned purposes in case of the following grounds:
 - 4.2.1. The conclusion, execution, amendment or termination of the agreement under which a User is a party, or a beneficiary (including an agreement for the use of the Website, an agreement for the provision of hotel services, the rules of the Loyalty Program D Rewards);
 - 4.2.2. A User's consent issued to the Operator;
 - 4.2.3. The performance of the functions and duties imposed on the Operator by the legislation of the Russian Federation
 - 4.2.4. User data processing is necessary for the Operator to exercise its rights and legitimate interests, or for third parties to exercise their rights and legitimate interests, provided that the rights and freedoms of a personal data subject are not violated.

5. A User's rights

- 5.1. A User has the following rights:
 - 5.1.1. **The right of access:** A User has the right to request any information about their personal data under Sections 8 and 9 of the Policy.
 - 5.1.2. **The right to revoke consent:** A User can revoke their consent to the processing of their personal data at any time by sending a notice to this effect to the Operator at members@dominarewards.com.
 - 5.1.3. **The right of clarification:** A User has the right to clarify, supplement, modify, correct the data stored by the Operator by sending a request to the Operator at members@dominarewards.com.

5.1.4. **Right of erasure:** A User may request that the data about them should be deleted (except in cases where the Operator is required by law to store such data).

5.1.5. A User enjoys other rights provided for in the Law on personal data.

6. Types of personal data collected subject to User consent

6.1. The Operator processes only those personal data of Users that are necessary to achieve the purposes of processing such data.

6.2. The list of personal data to be processed:

6.2.1. In order to ensure the implementation of the rules of the D Rewards Loyalty Programme and a User's ability to use the Website's functionality:

- A User's first name, last name, patronymic, date of birth, age, gender;
- A User's phone number and e-mail address;
- Data that can be automatically transmitted when accessing the Website, including the IP address, information from cookies, information about a User's browser (or other software used to access the Website), access time, the address of a requested page, the provider of Internet access services, information about the pages viewed on the Website, the log of all actions of a personal data subject on the Website, geographical data (estimated location), demographic information (gender and age), as well as other data that can usually be collected by data counters (a User can refuse to accept the "cookies" of the Website using the settings of their Internet browser, but this may lead to inconveniences while using the Website).

6.2.2. In order to ensure the operability and security of the Website:

- Data that can be automatically transmitted when accessing the Website, including the IP address, information from cookies, information about a User's browser (or other software used to access the Website), access time, the address of a requested page, the provider of Internet access services, information about the pages viewed on the Website, the log of all actions of a personal data subject on the Website, geographical data (estimated location), demographic information (gender and age), as well as other data that can usually be collected by data counters (a User can refuse to accept the "cookies" of the Website using the settings of their Internet browser, but this may lead to inconveniences while using the Website).

6.2.3. In order to inform a User about the Operator's services and send newsletters:

- A User's first name, last name, patronymic, date of birth, age, gender;
- A User's phone number and e-mail address.

6.3. There are special categories of data that are not collected and processed by the Operator.

6.4. A User must take a reasonable and responsible approach to posting their own personal data on the Website and not provide the Operator with excessive data, especially

personal data of a special category (about health status, political, religious, philosophical beliefs, etc.).

7. Operations with a User's Personal data

- 7.1. The Operator shall process personal data by performing the following actions: collection, use, storage, systematization, recording, extraction, accumulation, transfer (provision, access), clarification (updating, modification), depersonalization, blocking, destruction.
- 7.2. The Operator shall collect User data in the following ways:
 - 7.2.1. A User independently fills out the forms posted on the Website and provides his personal data;
 - 7.2.2. Personal data are collected automatically with the help of technologies and services: web-protocols, "cookie" files, web marks.
- 7.3. The Operator shall not store the Users' personal data longer than the purposes of processing such data require.
- 7.4. While collecting personal data of citizens of the Russian Federation through the Website, the Operator shall ensure the processing of such data with the use of databases located on the territory of the Russian Federation.
- 7.5. A User's Personal data is supposed to be destroyed in the following cases:
 - 7.5.1. The purpose of personal data processing has been achieved;
 - 7.5.2. Personal data is exposed to a security threat, or it is impossible to ensure lawful processing of such data;
 - 7.5.3. There is no longer any need to achieve the purpose of data processing;
 - 7.5.4. Consent to the processing of personal data has been revoked by a User;
 - 7.5.5. A User has provided information that their personal data is incomplete, outdated, inaccurate, obtained illegally or are not necessary for the stated purpose of processing;
 - 7.5.6. The liquidation or reorganization of the Operator.
- 7.6. The Operator shall not circulate or disclose Users' personal data².
- 7.7. The Operator may provide personal data for the Partners and/or entrust the Partners with the processing of such data, if this is a prerequisite for complying with the rules of the D Rewards Loyalty Program and performing the obligations under other agreements concluded with a User. The list of Partners is posted on the Operator's website.
- 7.8. The Operator can effect cross-border data transfers provided there are appropriate legal grounds for such an operation.

8. Information provided for a User upon request

- 8.1. The User has the right to contact the Operator through the communication channels

² Disclosing a User's personal data to an unidentified number of individuals or entities.

specified in Section 9 of the Policy and request the following information, which the Operator is obliged to provide:

- 8.1.1. A confirmation of the fact of personal data processing;
 - 8.1.2. The legal grounds for data processing;
 - 8.1.3. The purposes of, and the methods used the Operator for, the processing of personal data;
 - 8.1.4. The list of personal data pertaining to a User, the source of such data (unless a different way to present information is provided for by the law);
 - 8.1.5. The term of personal data processing, including the term of data storage;
 - 8.1.6. The manner in which a User can exercise their rights provided for by the Law on personal data;
 - 8.1.7. Information about cross-border personal data transfers (including possible one in the future);
 - 8.1.8. The name and location of the Operator, information about individuals or entities (except the Operator's employees) who have access to the data or who can gain access thereof on the basis of an agreement with the Operator or by virtue of the law;
 - 8.1.9. The company name, or the first name, last name, and patronymic of an individual, who the Operator entrusts with personal data processing, if processing has been, or will be, delegated to a legal entity or an individual;
 - 8.1.10. Information about the measures taken by the Operator to meet the requirements of the Law on personal data;
 - 8.1.11. Other information that may be related to a User and their Personal data.
- 8.2. A refusal by the Operator to provide information upon a User's request must be justified by the Operator.
- 8.3. A request for information shall include:
- 8.3.1. The number of a relevant User's main identification or that of their representative, information on the date of issue of the specified document and the issuing authority;
 - 8.3.2. Information confirming that a relevant subject of personal data is formally involved with the Operator (for example, the e-mail address with which a User registered on the Website, a User's identification number in the D Rewards Loyalty Program and/or other information), or any information otherwise confirming the fact of personal data processing by the Operator.
- 8.4. A User's right of access to their personal data may be restricted in such cases as provided for by the legislation.

9. Communication with the Operator

- 9.1. If a User has any questions about the Policy, they can send the Operator an inquiry in the

form of an electronic letter.

- 9.2. Inquiries are sent to the Operator at members@dominarewards.com.
- 9.3. The Operator shall review any inquiries and complaints received from Users, thoroughly investigate the facts of violations, take measures to eliminate them, punish those who are responsible for such violations, and try to resolve disputes and conflict situations in an extra-judicial manner.
- 9.4. A User's inquiry shall include:
 - 9.4.1. A User's first name, last name, and patronymic;
 - 9.4.2. Information confirming a User's formal involvement with the Operator and/or information that confirms that the Operator has processed such a User's personal data (for example, the email address with which the User registered on the Website, the identification number in the D Rewards Loyalty Program).
- 9.5. The Operator shall to respond to a User's inquiry within 30 (thirty) calendar days of the date of receipt of such an inquiry.

10. Term of processing of User data

- 10.1. The Operator processes the User's personal data until the goals set out in Section 4 of the Policy are achieved, unless another period has been agreed upon by the Operator and a User, or if another period is stipulated by the legislation.
- 10.2. If the Operator realizes that it is illegal to process personal data of a particular kind, the Operator shall discontinue the unlawful processing of such data within 3 (three) business days of realization and notify a relevant User of the elimination of violations.
- 10.3. If the Operator realizes that it is impossible to lawfully process a User's personal data, the Operator shall destroy such data within 10 (ten) business days of the date of realization and notify such a User of destructing their personal data.
- 10.4. If a User withdraws their consent to the processing of personal data, the Operator shall, within 30 (thirty) calendar days of the date of receipt of such a withdrawal, stop processing and destroy such a User's personal data. However, the Operator has the right to continue processing personal data if it is dictated by the Operator's obligation to satisfy the requirements of the current legislation and (or) the Operator's obligations under agreements concluded with such a User, as well as in other cases provided for by the current legislation.

11. Measures of personal data protection

- 11.1. Protection is required in order to prevent unauthorized or accidental access to personal data, to prevent their destruction, modification, blocking, copying, provision, distribution and other illegal actions with respect to User data.
- 11.2. Protection ensures the security of data during its processing, as well as confidentiality, integrity, accessibility and stability of processes and systems associated with data processing.
- 11.3. Protection is ensured by the Operator through the implementation of legal, organizational and technical measures necessary and sufficient to comply with the

provisions of the legislation.

11.4. The legal measures include the following:

- 11.4.1. Developing the Operator's bylaws that regulate personal data processing and establish procedures aimed at preventing violations (the Policy is one of such bylaws);
- 11.4.2. Identifying threats to the security of personal data while they are processed in the Operator's information systems;
- 11.4.3. Establishing rules for accessing personal data, ensuring registration and logging of all actions performed with personal data;
- 11.4.4. Refusing to employ any methods of processing personal data that do not correspond to the purposes predetermined by the Operator.

11.5. The organizational measures include the following:

- 11.5.1. Conducting internal audits in order to ensure the compliance of personal data processing and personal data security measures with the Law on personal data, the Policy, the Operator's bylaws, and other mandatory provisions established by the legislation;
- 11.5.2. Appointing an officer responsible for the organization of personal data processing;
- 11.5.3. Limiting the number of employees of the Operator who have access to personal data and organizing a permissive access system to such data;
- 11.5.4. Having the Operator's employees familiarize themselves with the provisions of the legislation of the Russian Federation on personal data, including the Law on Personal Data, with the requirements for personal data protection, with the Operator's bylaws related to personal data processing; training such employees;
- 11.5.5. Determining the locations of storage of tangible personal data carriers, as well as ensuring the registration and safety of such tangible media;
- 11.5.6. Introducing a security regime for the premises where personal data is processed or the software and hardware used for personal data processing are located.

11.6. The technical measures include the following:

- 11.6.1. Using the means of data protection which has passed the conformity assessment test in accordance with the established procedure;
- 11.6.2. Assessing the effectiveness of measures taken to ensure the security of personal data prior to the commissioning of the personal data information system;
- 11.6.3. Detecting unauthorized access to personal data and taking measures, including those aimed at detecting, preventing and eliminating the consequences of computer attacks on personal data information systems and responding to computer incidents in them (recovering personal data that was modified or destroyed as a result of unauthorized access);
- 11.6.4. Controlling the use of physical media of personal data storage.

- 11.7. The Operator evaluates the harm that may be caused to a User if the provisions of the Law on personal data are violated, and correlates such harm with the measures taken by the Operator and aimed at ensuring the its obligations are performed.
- 11.8. Measures are applied depending on the method and specifics of data processing.