

Personal Data Processing Policy

1. General provisions

This Personal data processing Policy has been drawn up in accordance with the requirements of Law "On Personal Data" (hereinafter referred to as the "Personal Data Processing Policy"). The Law on Personal Data) and defines the procedure for processing personal data and measures to ensure the security of personal data, taken by HomMuchTravel Inc (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-сайт <https://howmuchtravel.com>.

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. ВебWebsite– a set of graphic and informational materials, as well as computer programs and databases, that ensure their availability on the Internet at a network address <https://howmuchtravel.com>.

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. Personal data processing – any action (operation) or set of actions (operations), performed with the use of automation tools or without using such means with personal data, including collection, recording, systematization, accumulation, storage, clarification (update, change), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, 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://howmuchtravel.com>.

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://howmuchtravel.com>.

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 at making personal data available to an unlimited number of persons, including publishing personal data in the mass media, posting it in

information-and telecommunications 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 an 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 *содержащие персональные данные*;
- if the personal data subject withdraws consent to the processing of 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 provided by the Law on Personal Data 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 30 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, except in cases, provided for 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;
- make a condition of 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;
- 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 are required to::

- provide the Operator with reliable data 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. The Operator can process the following personal data of the User:

5.1. Email address.

5.2. Data for the trip to travel and requests.

5.3. Depersonalized user data is also collected and processed on the site (в т. including: файлов «cookies») using internet-statistics services (Yandex Metric and Google Analytics and others).

5.4. The above-mentioned data is referred to in the general concept of Personal Data throughout the Policy.

5.5. Processing of special categories of personal data, related to race, nationality, political views, religious or philosophical beliefs, intimate life, It is not performed by the operator.

5.6. Processing of personal data, that is allowed for distribution, from among the special categories of personal data, specified in h. 1 st. 10 It is allowed under the Law on Personal Data, , provided that the prohibitions and conditions, stipulated in Article 10.1 are met. The Law on Personal Data.

5.7. The User's consent to the processing of personal data, allowed for distribution, is issued separately from other consents to the processing of their personal data. At the same time , the conditions, stipulated, in particular, in Article 10.1 are observed. 10.1 The Law on Personal Data. The requirements for the content of such consent are established by the authorized body for the protection of the rights of personal data subjects .

5.7.1 Consent to the processing of personal data, authorized for distribution, The User provides the Operator directly.

5.7.2 The Operator is obliged to publish information about the processing conditions, prohibitions and conditions on the processing of personal data allowed for distribution by an unlimited number of persons no later than three working days from the date of receipt of the specified User consent, разрешенных для распространения.

5.7.3 The transfer (distribution, provision, access) of personal data, authorized by the personal data subject for distribution, must be stopped at any time at the request of the personal data subject. This requirement should include the last name, first name, patronymic (if any), contact information (phone number, email address or postal address) of the personal data subject , as well as a list of personal data that is subject to termination of processing . The personal data specified in this request can only be processed by the Operator, to whom it is sent.

5.7.4 Consent to the processing of personal data, allowed for distribution, is terminated from the moment the Operator receives the request, specified in clause 5.7.3 of this Personal Data Processing Policy.

6. Principles of personal data processing

6.1. The processing of personal data is carried out on a legal and fair basis.

6.2. 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.

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

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

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

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

6.7. Storage of personal data is carried out in a form, that allows determining 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 federal law, an agreement, стороной которого, to which the subject of personal data is a party, beneficiary or guarantor. The processed personal data is destroyed or depersonalized when the purposes of processing are achieved or when it is no longer necessary to achieve these goals, unless otherwise provided by federal law.

7. Purposes of personal data processing

7.1. Purpose of processing the User's personal data:

- providing the User with access to the services, information and/or materials, contained on the website <https://howmuchtravel.com>.

7.2. The Operator also has the right to send notifications to the User about new products and services, special offers and various events. The User can always refuse to receive informational messages, by sending an email to the Operator's email address hi@howmuchtravel.ru marked "Unsubscribe from notifications about new products and services and special offers".

7.3. Depersonalized User data, collected using Internet-statistics services, is used to collect information about User actions on the site, improve the quality of the site and its content.

8. Legal grounds for processing personal data

8.1. The legal grounds for processing personal data by the Operator are::

- authorized (constituent) documents of the Operator;
- contracts, concluded between the operator and the personal data subject;
- federal laws, иные нормативно and other regulatory acts in the field of personal data protection;
- consent of Users to the processing of their personal data, to the processing of personal data, allowed for distribution.

8.2. The Operator processes the User's personal data only if they are filled in and/or sent by the User independently through special forms, located on the site <https://howmuchtravel.com> or sent to the Operator via email. By filling out the relevant forms and/or sending your personal data to the Operator, The User agrees to this Policy.

8.3. The Operator processes depersonalized data about the User if this is allowed in the User's browser settings (storing cookies and using JavaScript technology is enabled).

8.4. The personal data subject independently makes a decision on the provision of his / her personal data and gives consent freely, voluntarily and in his / her own interest.

9. Terms of personal data processing

9.1. The processing of personal data is carried out with the consent of the personal data subject to the processing of his / her personal data.

9.2. 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 полномочий и обязанностей.

9.3. 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, that is subject to execution in accordance with the legislation of the Russian Federation on enforcement proceedings.

9.4. 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.

9.5. 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.

9.6. 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).

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

10. Procedure for collecting, storing, transmitting and other types of personal data processing
The security of personal data, processed by the Operator, is ensured by implementing legal, organizational and technical measures, necessary to fully comply with the requirements of the current legislation in the field of personal data protection.

10.1. The Operator ensures the security of personal data and takes all possible measures, that exclude access to personal data by unauthorized persons.

10.2. 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.

10.3. If inaccuracies in personal data are identified, The user can update them independently, by sending a notification to the Operator's email address hi@howmuchtravel.ru marked "Updating personal data".

10.4. 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 hi@howmuchtravel.ru marked "Revocation of consent to the processing of personal data".

10.5. 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 Privacy Policy. The subject of personal data and/or the User is obliged to familiarize themselves with the specified documents in a timely manner. The Operator is not responsible for the actions of third parties, including the service providers specified in this clause.

10.6. 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.

10.7. When processing personal data, the Operator ensures the confidentiality of personal data.

10.8. 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, стороной которой, to which the subject of personal data is a party, beneficiary or guarantor.

10.9. 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 or the withdrawal of consent by the personal data subject, as well as the identification of illegal processing of personal data.

11. List of actions, performed by the Operator with the received personal data

11.1. The Operator collects, records, systematizes, accumulates, stores, clarifies (updates, changes), extracts, uses, transmits (distributes, provides, accesses), depersonalizes, blocks, deletes and destroys personal data.

11.2. The Operator performs automated processing of personal data with or without receiving and/or transmitting the received information via information- and telecommunications networks.

12. Cross-border transfer of personal data

12.1. The operator must ensure, that, the rights of personal data subjects are reliably protected by the foreign State to whose territory it is intended to transfer personal data prior to the start of cross-border transfer of personal data *обеспечивается надежная защита прав субъектов персональных данных.*

12.2. Cross-border transfer of personal data on the territory of foreign states that do, not meet the above requirements, can only be carried out if the personal data subject has written consent to the cross-border transfer of his personal data and/or the execution of a contract, to which the personal data subject is a party .

13. 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.

14. Final provisions

14.1. 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 hi@howmuchtravel.ru.

14.2. 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.

14.3. The current version of the Policy is freely available on the Internet at <https://howmuchtravel.com/public/files/>.