

HOTEL CONTINENTAL®

МОСКВА ТВЕРСКАЯ

Privacy Policy for Guests of JSC SAMMIT (Hotel Continental)

Introduction

This Privacy Policy (the “Policy”) explains how JSC SAMMIT (Hotel Continental), hereinafter the “Hotel”, collects, uses and discloses your personal data. This Policy reflects our commitment to protect personal data as described below.

We use Guests’ personal data to fulfil our obligation to provide hotel and related services at the Hotel (the “Purpose”). As part of this obligation, we undertake to keep the personal data we collect confidential.

By using the Hotel’s services, you understand and acknowledge that we may collect, use and disclose your personal data in accordance with this Policy. If you provide personal data about another person, you must ensure that the person agrees to this Policy, explain how we may use that person’s data, and give the person an opportunity to review or receive a copy of this Policy.

Scope of This Policy

This Policy applies by default when you interact with the Hotel through our website, <https://continental-hotel.ru/>, and booking websites (together, the “Websites”); in person when you visit the Hotel; or by telephone, SMS, private message, social media or similar functionality. It also applies to personal data that we receive from a third party unless that third party’s privacy policy expressly provides otherwise.

Data We May Collect

We collect and process personal data to provide hotel services. The data collected may vary according to how you choose to interact with us. Categories may include:

- Contact and identification data: name, contact details such as telephone number, home or email address, title, employer details, passport and visa information, and other government-issued identification data.
- Account and marketing preferences: Hotel guest-loyalty account and enrolment information, frequent-flyer and partner-loyalty programme information, and marketing preferences.
- Stay and purchase information: arrival and departure dates; products and services purchased or used at the Hotel or on a Website; physical and digital room-key use; special requests; service, stay, room and holiday preferences; dialled telephone numbers; calls and messages received; content and feedback you provide about your stay; and information collected through CCTV, Internet systems, wired or wireless networks, mobile or smart devices, geolocation, and other security systems and technologies.
- Device, Internet and network activity: IP address; data from devices connected to or detected by Hotel wireless networks; use of Wi-Fi and services accessed through it; interactions with our Websites and online content; visit date and time, pages viewed and time spent; browser, device model, manufacturer and operating system; searches; referring and subsequent URLs, including advertisements; interactions with links, content and advertising; session recordings; mobile-device identifier, network and browser data; and engagement with emails or messages measured through web beacons, tags, pixels and similar technologies.
- Payment and credit information: credit-card and other payment-method data and, in limited cases, information about a customer’s credit-account status.
- Location and demographic data: precise geolocation where permitted by law, general location derived from IP address or postal code, sex, nationality, age, and date and place of birth.
- Biometric, medical or other sensitive personal data: health or religious information supplied to meet a special request, and biometric data such as information used for facial recognition.

- Audio and visual information: recordings of customer-service calls and CCTV footage that may include your voice and/or image.
- Preferences, inferences and device content: stated preferences; inferences about preferences, characteristics or predispositions based on other personal data; and, with your permission, information relating to content on your device.

In some jurisdictions, certain data may be treated as Sensitive Personal Data. Depending on applicable law, this may include data revealing or permitting inferences about racial or ethnic origin, political opinions, religious or similar beliefs, trade-union or professional, religious, philosophical or political association membership, physical or mental health or condition, medical treatment, genetic data, biometric information or sexual orientation. In rare cases, financial records, credit-card details and location data may also be considered sensitive where you live.

Where we process Sensitive Personal Data on the basis of consent, you may withdraw that consent at any time. We process such data only where and to the extent permitted or required by applicable law. By agreeing to this Policy, where permitted or required by law, you give express written consent to the processing of personal data supplied to JSC SAMMIT that is regarded as Sensitive Personal Data or financial information.

We obtain personal data directly from Guests or persons acting for them; automatically from devices and our networks through cookies and related technologies; from business and marketing partners, social-media platforms, relatives, friends, travel agents, employers, travel companies, airlines, card issuers and loyalty providers; and from social-media posts or profiles containing such data.

How We Use Your Data

Subject to applicable law, we may collect, use and disclose personal data to:

- provide, charge for and manage hotel stays and other products and services; provide support and a higher or personalised level of service at the Hotel and through Websites, loyalty programmes, third-party applications, products or services, and future Hotel offerings; and arrange concierge services on your behalf, such as restaurant, attraction and transport bookings.
- evaluate, analyse and improve our Websites, products and services; administer loyalty, travel, discount and frequent-guest programmes; and manage competitions, sweepstakes and other promotions.
- fulfil contractual obligations to you, people involved in arranging your travel, and suppliers such as card issuers, airlines and third-party loyalty, travel or discount programmes.
- conduct market research, customer-satisfaction and quality-assurance surveys; carry out marketing and promotions; and, where lawful, display targeted advertising for products, services, events or promotions offered by the Hotel or others, including advertising based on information or activity collected by us or third parties.
- protect staff, guests, visitors and others; prevent, detect and investigate fraud; communicate about our relationship, including Policy updates and important legal or business changes; maintain general records; comply with legal, regulatory and compliance obligations; test and evaluate new products and services; process credit applications; and pursue other purposes disclosed to you in accordance with law or with your consent.
- verify your identity when you submit a request concerning personal data under this Policy. Verification steps and the personal data requested may vary according to the sensitivity and nature of the request.

The Hotel uses and retains personal data for as long as necessary for the purposes for which it is processed and in accordance with legal and regulatory obligations and risk-management principles.

Legal Basis for Processing

When processing personal data about a Guest or another person with whom we do business, we rely, as appropriate, on: (i) our legitimate interests described above; (ii) our legal obligations; (iii) the necessity of the information to perform contractual obligations to you, persons arranging your travel and/or suppliers; or (iv) your consent.

Disclosure of Your Personal Data

We may disclose personal data from time to time, always in accordance with applicable law. By agreeing to this Policy, where permitted or required by law, you consent to transfers to the third parties, for the purposes and to the extent described in this and the preceding sections.

Our agents, service providers and suppliers. Like most hotel brands, we may engage third parties to perform functions or process information. When they process personal data or receive it from us, we require appropriate safeguards.

Business transfers. As our business develops, we may sell hotels or other assets, and personal data or control of it may form part of the transferred assets. If our company or a substantial part of its assets is acquired, personal data may similarly be transferred. We may also transfer personal data to a third party we acquire to facilitate merger and acquisition transactions and their purposes.

Legal requirements. We may disclose personal data in response to a court, law or government authority, or where necessary or appropriate to comply with law or protect our rights and property. We may retain and use collected data to meet accounting, tax and statutory retention requirements.

Interacting with Us Online

Anonymous use. You may visit our Websites without registering or otherwise identifying yourself.

Cookies and tracking technologies. We and other parties use cookies, pixels, beacons and related technologies on Websites, in email and in advertising. They help improve products and services and enable us, advertising networks, social networks and other providers to place and display advertisements and personalised content.

Links to other websites. Our Websites may link to third-party sites used for services such as gift certificates, ticket bookings, insurance or online job applications. Check the browser address bar when following a link. This Policy and our responsibility cover only our information practices. We do not control or guarantee third-party privacy practices or content, even where a link appears on our Websites. Review the privacy and security terms of an external site before providing personal data there.

Security

Because the security of personal data matters to us, we use Transport Layer Security ("TLS") to encrypt personal data supplied online. A closed-padlock or key symbol and an address beginning with "https" indicate an encrypted connection; without them, requested data may not be encrypted before transmission.

Personal data received online is stored by us and/or service providers in databases protected by physical and electronic access controls, access-restriction technologies and other reasonable safeguards. No safeguard can provide absolute protection against loss, misuse or alteration. To the extent permitted by law, we are not liable for damage or loss arising from such incidents. Where required by law, we will notify you of an incident that may affect you so that you can protect your rights.

Your Choices and Marketing Communications

You may choose which personal data to provide, but withholding certain data may affect our interaction with you, for example by preventing us from completing a reservation.

Where permitted by law, we may use contact details to tell you about products, services, offers and events that may interest you and may share data with carefully selected third parties that contact you directly. Some jurisdictions require separate consent. You may opt out by contacting us or following unsubscribe instructions in a message.

Members of a frequent-guest programme may select contact and delivery preferences when enrolling or creating a profile, including whether to receive offers, marketing or advertising by email or post and whether to participate in surveys. Preferences may be changed at any time.

We will honour a request not to send direct marketing. After such a request, contact details are blocked rather than deleted so that the request remains recorded until you give consent that supersedes it.

Changes to This Policy

Because our activities change over time, this Policy may also change. For convenience, its effective date appears at the end of this document.

Requests for access to personal data must be made in writing by ordinary mail. We may respond by ordinary or electronic mail, telephone or another appropriate method.

Effective date: December 2024