

Personal Data Processing Policy

1. General Provisions

1.1. This Personal Data Processing Policy of LLC “Liga-Tour” (hereinafter referred to as the “Operator” or the “Organization”) sets forth the purposes, scope, and procedures for processing personal data, the measures implemented to protect personal data, as well as the procedures aimed at identifying and preventing violations of the legislation of the Russian Federation in the field of personal data within the Organization.

1.2. This Personal Data Processing Policy (hereinafter referred to as the “Policy”) has been developed in accordance with Article 7 and paragraph 2 of Article 18.1 of Federal Law No. 152-FZ “On Personal Data” dated July 27, 2006, Article 86 of the Labor Code of the Russian Federation, Article 152.2 of the Civil Code of the Russian Federation, and other regulatory legal acts of the Russian Federation governing the protection and processing of personal data. The Policy applies to all personal data (hereinafter referred to as the “Data”) that the Organization may obtain from a data subject, a consumer or another customer who is a party to an agreement for the provision of a tourist product and/or tourist services, from counterparties of the Organization who have entered into civil law contracts with the Organization, from users of the website <https://elgastour.ru/> (hereinafter referred to as the “Website”) which contains information about the Operator’s services, as well as from a data subject who is employed by the Operator and whose relationship with the Operator is governed by labor legislation (hereinafter referred to as the “Employee”).

1.3. The Operator ensures the protection of processed personal data from unauthorized access and disclosure, unlawful use, or loss, in accordance with the requirements of Federal Law No. 152-FZ “On Personal Data” dated July 27, 2006.

1.4. The Operator is LLC “Liga-Tour”, TIN/OGRN 0500001570/1230500018100.

1.5. Registered address: 125 Imam Shamil Street, Gunib village, Gunibsky District, Republic of Dagestan, 368340.

1.6. This Policy and any amendments hereto shall be approved by the Director of LLC “Liga-Tour” and enacted by an internal order. All employees of LLC “Liga-Tour” must be duly familiarized with this Policy and any amendments against signature. Compliance with this Policy is mandatory for all employees of LLC “Liga-Tour” who have access to personal data.

1.7. To ensure unrestricted public access to this Policy, LLC “Liga-Tour” publishes its full text on the official website of the Organization at www.elgastour.ru (hereinafter referred to as the “Website”).

1.8. The Website may contain hyperlinks to other websites provided by third parties. The Operator does not control and is not responsible for third-party websites that a user may

access via such hyperlinks. Once a user leaves the Website, the Operator bears no responsibility for the protection and confidentiality of any information provided by the user as a personal data subject or any personal information in general. Data subjects are advised to exercise caution and consult the relevant privacy policy of the respective website they visit.

1.9. LLC “Liga-Tour” reserves the right to amend this Policy as necessary in response to changes in applicable Russian legislation or changes in its business operations.

2. Key Terms and Definitions

2.1. Personal Data – any information directly or indirectly relating to an identified or identifiable individual (personal data subject).

2.2. Processing of Personal Data – any action (operation) or set of actions (operations) performed with or without the use of automation tools in relation to personal data, including collection, recording, systematization, accumulation, storage, clarification (updating, modification), retrieval, use, transfer (distribution, provision, access), anonymization, blocking, deletion, and destruction of personal data.

2.3. Operator – a state authority, municipal authority, legal entity, or individual who independently or jointly with other persons organizes and/or carries out the processing of personal data, and also determines the purposes of processing personal data, the scope of personal data to be processed, and the actions (operations) performed with the personal data.

2.4. Personal Data Subject – an individual to whom the personal data relates.

2.5. Confidentiality of Personal Data – a mandatory requirement for the Operator and other persons who have access to personal data to prevent their disclosure to third parties without the consent of the data subject or without other legal grounds.

2.6. Automated Processing of Personal Data – processing of personal data using computing technology.

2.7. Dissemination of Personal Data – actions aimed at disclosing personal data to an indefinite number of persons.

2.8. Provision of Personal Data – actions aimed at disclosing personal data to a specific person or a specific group of persons.

2.9. Blocking of Personal Data – temporary cessation of the processing of personal data (except in cases where processing is necessary for clarification of personal data).

2.10. Destruction of Personal Data – actions as a result of which it becomes impossible to restore the content of personal data in the information system of personal data and/or as a result of which material carriers of personal data are destroyed.

2.11. Anonymization of Personal Data – actions as a result of which it becomes impossible to determine, without the use of additional information, the belonging of personal data to a specific personal data subject.

3. Main Rights and Obligations of the Operator

3.1. The Operator has the right to:

- Independently determine the composition and list of measures necessary and sufficient to ensure compliance with the obligations stipulated by Federal Law No. 152-FZ “On Personal Data” and other regulatory legal acts, unless otherwise provided by law;
- Entrust the processing of personal data to another person with the consent of the data subject, unless otherwise provided by Federal Law;
- Continue processing personal data after the withdrawal of consent if legal grounds are provided by Federal Law;
- Defend its interests in court;
- Process publicly available personal data of individuals;
- Process personal data subject to publication or mandatory disclosure in accordance with federal law.

3.2. The Operator is obliged to:

- Process personal data in accordance with the requirements of Federal Law No. 152-FZ;
- Take confidentiality measures;
- Publish and ensure access to this Policy;
- Prevent unauthorized access and protect personal data using technical and organizational measures;
- Respond to inquiries from data subjects;
- Provide information to the authorized regulatory body upon request.

4. Main Rights of the Personal Data Subject

4.1. A personal data subject has the right to:

- Receive comprehensive information about the processing of their personal data;
- Request clarification, blocking or destruction of personal data;
- Withdraw consent;
- Take legal action;
- File complaints to regulatory bodies;
- Exercise other rights provided by the legislation.

5. Processing of Personal Data

5.1. Carried out in accordance with the law.

5.2. Processing purposes include:

- Contract execution;

- Fulfillment of legal obligations;
- Service provision;
- Communication;
- Marketing and feedback;
- Legal compliance.

5.3. Legal grounds:

- Consent;
- Contract;
- Law.

5.4. Subject categories:

- Website users;
- Clients;
- Contractors;
- Employees.

5.5. Data categories:

- Names;
- Dates of birth;
- Contact info;
- Passport details;
- IP and session data.

5.6. Methods: automated and manual. No profiling with legal effects.

6. Storage and Destruction of Personal Data

6.1. Stored only as long as necessary or required by law.

6.2. Destroyed upon achieving processing goals or legal expiration.

6.3. May be destroyed at the subject's request unless otherwise required by law.

6.4. Destruction is irreversible.

7. Measures to Ensure the Security of Personal Data

7.1. The Operator shall take all necessary measures to protect personal data.

7.2. Measures include:

- Appointing responsible personnel;
- Adopting internal regulations;
- Using certified security tools;
- Limiting access;
- Monitoring and audit.

8. Final Provisions

- 8.1. Policy approved by Director.
- 8.2. Mandatory acknowledgment by employees.
- 8.3. Amendments allowed with legal or operational changes.
- 8.4. Published at www.elgastour.ru.

9. Protection of Personal Data

9.1. In accordance with applicable regulatory requirements, the Operator has established a personal data protection system, which consists of legal, organizational, and technical protection subsystems.

9.2. The legal protection subsystem comprises a set of legal, administrative, and regulatory documents that ensure the creation, functioning, and continuous improvement of personal data protection systems.

9.3. The organizational protection subsystem includes the management structure of the personal data protection system, access control mechanisms, and procedures for information protection when interacting with employees, partners, and third parties.

9.4. The technical protection subsystem consists of a set of technical, software, and hardware-software tools designed to ensure the security of personal data.

9.5. The main personal data protection measures implemented by the Operator include:

- Appointment of a person responsible for the processing of personal data, who organizes data processing, conducts staff training and instruction, and performs internal monitoring of compliance with personal data protection requirements by the institution and its employees;
- Identification of current threats to the security of personal data during processing in personal data information systems, and development of corresponding protection measures and actions;
- Establishment of access control rules for personal data processed in information systems, as well as registration and recording of all actions performed with personal data in such systems;
- Assignment of individual access passwords to employees in accordance with their job responsibilities;
- Use of certified information security tools that have passed the mandatory conformity assessment procedures;
- Deployment of certified antivirus software with regularly updated databases;
- Compliance with conditions that ensure the preservation of personal data and prevent unauthorized access;

- Detection of unauthorized access to personal data and implementation of response measures;
- Restoration of personal data that was altered or destroyed due to unauthorized access;
- Training of employees directly involved in the processing of personal data on the provisions of Russian legislation regarding personal data, including data protection requirements, and familiarization with internal policies and local acts governing personal data processing;
- Conducting vulnerability scans of services and applications using a combination of static code analysis and dynamic testing to ensure software security;
- Encryption of all user data in transit using TLS;
- Annual independent penetration testing of the Website;
- Internal control and audit activities.

10. Rights of the Personal Data Subject and Duties of the Operator

10.1. Main Rights of the Personal Data Subject

10.1.1. The personal data subject has the right to obtain information regarding the processing of their personal data, including:

1. Confirmation of the fact of personal data processing by the Operator;
2. Legal grounds and purposes for processing personal data;
3. Purposes and methods used by the Operator to process personal data;
4. The name and location of the Operator, as well as information on individuals (except the Operator's employees) who have access to personal data or to whom personal data may be disclosed under a contract with the Operator or in accordance with federal law;
5. The personal data being processed related to the respective subject, and the source of such data unless a different procedure for providing such data is established by federal law;
6. The timeframe for processing personal data, including retention periods;
7. The procedure for exercising the rights of the personal data subject under Federal Law;
8. Information on actual or intended cross-border data transfers;
9. The name (or surname, first name, and patronymic) and address of any third party processing personal data on behalf of the Operator, if processing is or will be delegated to such party;
10. Other information provided for by this or other federal laws.

This information must be provided to the personal data subject in an accessible form and must not contain personal data of other individuals unless there are lawful grounds for such disclosure.

The above information shall be provided to the data subject or their representative by an authorized employee of the Operator responsible for processing the relevant personal data within ten (10) business days from the date of request or receipt of the request from the subject or their representative.

This period may be extended by no more than five (5) business days if the Operator sends a reasoned notification to the data subject indicating the grounds for the extension.

The request must contain: the number of the primary identification document of the personal data subject or their representative, the date of issue of the document and the issuing authority, and details confirming the data subject's relationship with the Operator (contract number, date, identifying terms, etc.), or other data confirming the processing of personal data by the Operator, along with the signature of the subject or their representative.

10.1.2. The personal data subject has the right to request the Operator to rectify, block, or delete their personal data if it is incomplete, outdated, inaccurate, unlawfully obtained, or not necessary for the stated purpose of processing, and to take other legal measures to protect their rights.

10.2. Duties of the Operator

The Operator is obligated to:

1. Provide information about personal data processing upon request of the data subject;
2. Notify the personal data subject if the data was obtained not from them directly;
3. If personal data is not provided, explain the consequences of such refusal to the data subject;
4. Publish or otherwise ensure unrestricted access to this Policy;
5. Take or ensure the adoption of necessary legal, organizational, and technical measures to protect personal data from unlawful or accidental access, destruction, modification, blocking, copying, provision, dissemination, and other unlawful acts;
6. Respond to requests and inquiries from personal data subjects, their representatives, and the authorized body for the protection of personal data subjects' rights;
7. Refuse to provide the requested data if the request fails to meet the legal requirements outlined in paragraph 10.1.1, or other applicable legislation. Such refusal must be justified;
8. In the event of an unlawful or accidental transmission (disclosure, dissemination, access) of personal data resulting in a breach of the subject's rights, notify the authorized body for the protection of personal data subjects within the timeframes established by Part 3.1 of Article 21 of Federal Law No. 152-FZ "On Personal Data."

11. Withdrawal of Consent to Personal Data Processing

11.1. The personal data subject's consent remains valid for an indefinite period; however, the subject has the right to withdraw their consent at any time in accordance with applicable law by sending a written notice to the Operator's registered address or via email to: info@elgas-tour.ru with the subject line "Withdrawal of Consent to Personal Data Processing."

11.2. Withdrawal of consent shall result in the deletion of the user's account on the Website and the destruction of records containing personal data, both in paper form and in the information systems of the Operator and any third parties, within ten (10) business days from the date of receipt of the withdrawal notice.

11.3. The user may independently delete saved cookies in their browser settings at any time.

The user may also disable cookie processing through browser settings; however, in such cases, the Operator does not guarantee the proper functioning of the Website and its services.