

# Personal Data Processing Policy

This Personal Data Processing Policy (hereinafter - the "Policy") describes how ForSe Ltd (PSRN 1127746707758, TIN 7703774970) (also referred to as "we", "us", "our") processes personal data of visitors of the website <https://www.thelegendofmoscow.com>

Please read this Policy so that you understand the purposes for which we process your personal data and how you can exercise your rights in relation to your personal data.

## **You may use the following contacts to reach us about the processing of personal data:**

- 109012, Moscow, Okhotny Ryad str. 2 (Four Seasons Hotel Moscow)  
pd@thelegendofmoscow.com

## **Terminology**

Personal data - any information that directly or indirectly relates to or identifies you.

A personal data operator is a legal or natural person who processes personal data. When you visit our website, ForSe Ltd processes your personal data and therefore is the operator of your personal data.

Processing of personal data - any actions with personal data.

## **Your basic rights when processing personal data**

In accordance with Federal Law No. 152-Φ3 of 27.07.2006 "On Personal Data" (hereinafter referred to as "152-Φ3"), you have the rights:

- to access personal data;
- to clarify personal data;
- to block or delete personal data;
- to complain about our actions or omissions;
- to appeal against decisions taken on the basis of exclusively automated processing of personal data;
- to withdraw your consent to the processing of personal data.

## **How can you exercise your rights?**

You (or your authorized representative) may send an official request to our address:

2, Okhotny Ryad St., Moscow, 109012, specifying therein details of your identification document (type of document (passport), series and number, date of issue), full name, information about the nature of our relationship with you, which will confirm that we process your personal data, and the signature of the person sending the request.

The request may also be sent to us in the form of an electronic document by e-mail to [pd@thelegendofmoscow.com](mailto:pd@thelegendofmoscow.com), in which case the request must be signed by electronic signature in accordance with the provisions of Russian law on electronic signature.

You can appeal against our actions as the operator of personal data to the territorial body of Roskomnadzor in your region.

## **Purposes, terms and legal grounds for our processing of your personal data. List of the personal data we process.**

This Policy contains the detailed information about why, how and which of your data we process, where and to whom we transfer if required.

For the purposes listed below, we collect, record, systemize, accumulate, store, clarify (update, amend), retrieve, use, transfer (provide, give access), block, delete, and terminate your personal data.

We do not process special categories data or biometric data. The data may be processed by automated, non-automated or mixed methods.

Once the specified processing purposes are achieved, your personal data will be terminated from our information systems by means of integrated information systems tools or by physical destruction of the data medium.

### ***Processing of enquiries received at the contact email addresses [res.moscow@thelegendofmoscow.com](mailto:res.moscow@thelegendofmoscow.com); [concierge.moscow@thelegendofmoscow.com](mailto:concierge.moscow@thelegendofmoscow.com)***

By submitting a request for cooperation or simply by contacting us via the e-mail address provided, you will provide us with the following details: your e-mail address and first name (patronymic/ second name and surname if provided). Apart from that, other information that you provide us in your e-mail will be made available to us.

The legal basis for processing communicated personal data is the person's initiative to cooperate with the operator in accordance with par.5 part 1 Article 6 of the Federal Law 152-Φ3, as well as the legitimate interest of the Operator in accordance with par.7 part 1 Article 6 of the Federal Law 152-Φ3.

We shall terminate your personal data at the end our cooperation on your issue, depending on the nature of the enquiry (in accordance with part 4 Article 21 of the Federal Law 152-Φ3 data shall be terminated within 30 days after the enquiry is considered and decision is made). If we enter a contract with you as a result of your enquiry, we will continue to process your personal data while execution of and on terms of our contract.

If your company contacts us to enter into a contract, we will process the following personal data of your representatives:

- surname, first name, patronymic (if provided);
- employer (company name)
- job title;

- e-mail address;
- contact telephone number.

In the case we enter into a contract after negotiations, we will process all data about you and your employees on conditions of and within the term of the concluded contract.

We will terminate all data about you, your representatives and other data given in connection with the execution of the contract after 5 years from the date of termination/expiration of our contract. We are obliged to retain the information during this time as required by Russian law:

- for 3 years after termination/expiration of the contract for the purposes of legal protection of the Operator's interests under art.196 of the Civil Code of the Russian Federation;
- for 5 years after termination/expiration of the contract for accounting and tax purposes in accordance with Art. 23 of the Tax Code of the Russian Federation, Art. 29 of the Federal Law "On Accounting" No.402-ФЗ.

***Processing of a request for Amnis Spa services,  
sent via the feedback form on the website***

If you contact us via the feedback form on our website at <https://www.thelegendofmoscow.com/amnis-spa> to submit a Request for Service and to book a date and time for your visit, we will process your data in order to answer you and to confirm that your Request can be executed, to clarify your wishes or to suggest alternative options available.

For this purpose we will use your:

- name;
- contact telephone number;
- other information that you choose to provide in your Request, including your contact e-mail address and information about the desired date/time of visit.

The legal basis for the processing of the personal data is the person's initiative to cooperate with the Operator in accordance with par.5 part 1 Article 6 of the Federal Law 152-ФЗ, the consent of the person who submitted the request as well as the legitimate interest of the Operator in accordance with par.7 part 1 Article 6 of the Federal Law 152-ФЗ.

If you book a service at our SPA-centre as a result of the submitted Request, we will continue to process your personal data in order to fulfil your Request. If after review and discussion of your Request you do not book a service, your data will be terminated within not more than 30 days following the decision on your Request in accordance with par.4 Article 21 of Federal Law 152-ФЗ.

***Contacting via phone numbers indicated on the website***

You can call us, so we get your phone number and ask for your name. We will terminate your personal data as soon as we end our communication on your matter. If we enter into a contract with you, we will continue to process your personal data while execution of and on terms of our contract.

***Processing of personal data when booking hotel services (rooms) on the website***

You can book accommodation and other hotel services at the Four Seasons Hotel Moscow hotel by using the Booking Module on the website (<https://thelegendofmoscow.com/booking/>).

In this case we get the following data about you:

- name, surname, patronymic (if provided);

- e-mail address;
- contact phone number
- nationality (if provided)
- check-in / check-out dates
- payment information (for guaranteed reservations)
- other information you may consider necessary to provide us by filling in the booking form.

The legal basis for the processing of the personal data is the person's initiative to enter into a contract for the provision of hotel services in accordance with par.5 part 1 Article 6 of the Federal Law 152-Φ3, as well as the legitimate interest of the Operator in accordance with par.7 part 1 Article 6 of the Federal Law 152-Φ3.

We shall process the data received during the term of the contract concluded on your booking request in order to fulfil it. We will terminate your / your representatives data and other data received in connection with the performance of the contract after 5 years from the termination/expiration of the contract / date of departure. We are obliged to retain the information during this time as required by Russian law:

- for 3 years after termination/expiration of the contract for the purposes of legal protection of the Operator's interests under art.196 of the Civil Code of the Russian Federation;
- for 5 years after termination/expiration of the contract for accounting and tax purposes in accordance with Art. 23 of the Tax Code of the Russian Federation, Art. 29 of the Federal Law "On Accounting" No.402-Φ3.

The Reservation service (Booking Module) is provided by TRAVEL LINE SYSTEMS LLC (Russia, 424003, Republic of Mari El, Yoshkar-Ola, Leninsky pr. 56A). Accordingly, this person is processing your personal data as our authorized agent. Please read the Privacy Policy and the Online Booking Policy of TRAVEL LINE SYSTEMS LLC, available by clicking on the link during the booking process.

### ***Subscribe to the newsletter for news and special offers***

From time to time we prepare materials about special offers on our services, our news and events. We use your:

- name;
- email address
- telephone number.

In addition, we may receive data on the date of subscription to the newsletter, the fact and time of opening the message, and the fact of clicking on the link in the message. We also receive information as to whether your e-mail address/number is available for receiving messages.

The legal basis for the processing of the personal data is your consent to the processing of your personal data. You have the right to withdraw your consent to the processing of personal data by simply contacting us or unsubscribe according to instruction in email/sms newsletter.

We will delete your personal data as soon as you unsubscribe from our newsletter or if we cancel our marketing & advertising newsletters mailing/messaging before you unsubscribe.

### ***Analytics of our website visits***

We would like you to feel comfortable using our website so that we can improve it to meet your preferences and enhance user experience. So for proper work of our website we use cookies to recognise you when you visit our website, remember your preferences and provide you with a personalised experience.

What are cookies? Cookies are small files, usually consisting of letters and numbers, downloaded to your device when you visit certain websites. Cookies allow a website to recognise your device and display our website according to your preferences.

What cookies we use:

- Strictly necessary cookies without which our website will not function properly and which provide basic functions such as page navigation, etc.
- Preference cookies which help to remember your preferences on our site so you don't have to change your preferences on a new visit
- Statistical cookies which help us understand how you interact with our website
- Marketing cookies, these help us to show you the most relevant products and offers, the advertising that is relevant and attractive to the individual user

Downloaded cookies are stored by your browser and may remain valid, depending on their type. They can be stored until the end of the session or until the User clears the browser, even for unlimited time period.

If you do not want us to collect your data by means of cookies, you can disable them in your browser settings. You can read more about this at the links: [Google Chrome](#) , [Yandex](#) , [Mozilla Firefox](#)

In addition to cookies, we use tracking technologies such as tags and scripts on our site to collect and store information about you. When you use our website, we collect information about you such as your IP address, location (country or city), operating system and version of your device, browser type and version on your device, type of device and its display resolution, the source of your traffic, operating system and browser language, and your browsing history. These technologies are used to analyse your website behaviour and to gather demographic information about our customer base as a whole in order to improve the quality and value of the services we provide. Our websites use cookies and retargeting pixels from analytics services, such as Yandex.Metrika.

Personal data collected by these web analytics services is processed with the prior consent of the website user to process such personal data provided by the website user by confirming (by pressing the "OK" button in the pop-up window) when you access the website.

### **Data security**

Personal data we collect and store is considered as confidential information. It is protected against loss, modification or unauthorised access during its processing, as required by Russian law. We employ technical and organisational measures for it. We continuously strive to improve our systems and procedures for data protection.

### **Changing our policies**

If our business processes change, new services emerge or the law changes, we will update this Policy and make changes. The most current version of this Policy is always published on our website.

### **Collection of Minors' Personal Data**

Our website does not process the personal data of minors. If you have reason to suppose that a child has provided us with personal data through our website, please notify us by emailing [pd@thelegendofmoscow.com](mailto:pd@thelegendofmoscow.com)