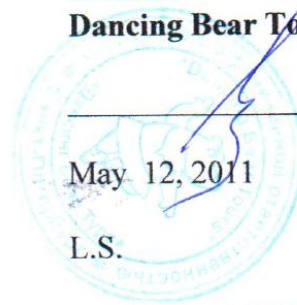


Approved by
Director
Dancing Bear Tours CoLtd



/ Yu.P. Ivanushkina /

PERSONAL DATA PROCESSING AND PROTECTION POLICY

1. General Provisions.

1.1. This Personal Data Processing and Protection Policy (hereinafter referred to as the “Policy”) are drawn up in accordance with Clause 2 of Article 18.1 of Federal Law No. 152-FZ “On Personal Data” dated July 27, 2006 (as amended) and other regulatory legal acts of the Russian Federation in the field of protection and processing of personal data and applies to all personal data (hereinafter referred to as the “Data”) that the Organization (hereinafter referred to as the “Operator”, the “Company”) may receive from the subject of personal data (tourist or another customer), who is a party to the agreement related to the sale of a tourism product and the provision of tourism services that are part of the tourism product, as well as from the personal data subject that is in relations with the Operator regulated by labour legislation (hereinafter — the Employee).

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

1.3. The Operator is located at: 18-67, Bryantsev str., 195269 St.Petersburg, Russian Federation

1.4. Policy Change.

1.4.1. The Operator has the right to make changes to this Policy. When making changes, the heading of the Policy indicates the date of the latest version of the revision.

1.4.2. The Policy comes into force from the moment it is posted on the site, unless otherwise provided by the new version of the Policy.

2. Terms and Acronyms

Personal data — any information relating directly or indirectly to a particular or determinable individual (subject of personal data). Such information, in particular, is the last name, first name, middle name, year, month, date of birth, address, marital status, social status, property status, education, profession, income, other information relating to the subject of personal data.

Operator — a legal entity or an individual organizing and (or) processing personal data, independently or jointly with other individuals, as well as determining the purposes of processing personal data, the composition of personal data to be processed, actions (operations) performed with personal data.

Personal data processing — any action (operation) or a set of actions (operations) performed with personal data using automation tools or without using such tools, including collection, recording, systematization, accumulation, storage, clarification (updating, modification), retrieval, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data.

Automated processing of personal data — processing of personal data using computer technology.

Personal data information system — a set of personal data contained in databases and providing their processing of information technologies and technical means.

Publicly available personal data — personal data posted by the personal data subject in publicly available personal data sources (including directories, address books), access to which is provided to an unlimited circle of people, or personal data posted in publicly available personal data sources on the basis of the written consent of the personal data subject.

Providing personal data — actions aimed at the disclosure of personal data to a particular individual or a certain circle of individuals.

Blocking of personal data — temporary termination of the processing of personal data (unless the processing is necessary to clarify personal data).

Destruction of personal data — actions, as a result of which it becomes impossible to restore the content of personal data in the personal data information system and (or) as a result of which physical carriers of personal data are destroyed.

Cross-border transfer of personal data is the transfer of personal data to the territory of a foreign state to a foreign government authority, a foreign individual or a foreign legal entity.

3. Personal Data Processing

3.1. Receiving personal data.

3.1.1. The receipt of personal data, with the exception of publicly available personal data, is carried out by the Operator directly from the subjects of personal data, or individuals who have duly executed powers to represent the interests of the subjects of personal data when transferring personal data to the Operator. If the personal data of the subject can be obtained only from a third party, then the subject must be notified of this or a written consent must be obtained from him or her.

3.1.2. Upon receipt of personal data, the Operator is obliged to inform the subject of personal data:

- on the purposes of obtaining personal data by the Operator;
- on the list of personal data requested by the Operator;
- on the list of actions that the Operator intends to perform with personal data;
- on the period during which the consent of the personal data subject to the processing of personal data is valid;
- on the procedure for revoking consent to the processing of personal data;
- on the consequences of the refusal of the personal data subject to provide the Operator with consent to receive and process personal data.

3.1.3. Documents containing personal data are created by:

- copying the original documents (passport of a citizen of the Russian Federation, certificate of education, INN certificate, pension certificate, SNILS, etc.);
- entering information into record-keeping forms;
- obtaining the originals of the necessary documents (passport of a citizen of the Russian Federation, income certificate, employment record book, medical report, character reference, etc.).

3.2. Personal data processing.

3.2.1. Processing of personal data is carried out by the Operator in compliance with the principles and rules stipulated by Federal Law No. 152-ФЗ “On Personal Data” dated July 27, 2006 (as amended), in the following cases:

- under the consent of the personal data subject to the processing of his or her personal data;
- processing of personal data is necessary for the execution of an agreement on the sale of a tourism product, to which either the beneficiary or guarantor is a subject of personal data;

- in cases when processing of personal data is necessary for the Operator to carry out and fulfil the functions, powers and duties assigned by the legislation of the Russian Federation;
- processing of personal data is necessary to protect the life, health or other vital interests of the subject of personal data, in case obtaining the consent of the subject of personal data is impossible.

3.2.2. Purpose of processing personal data:

- implementation of civil law relations, including those related to the fulfilment of obligations under agreements on the sale of a tourism product, and the provision of services that are part of the tourism product being sold;
- implementation of labour relations.

3.2.3. Categories of personal data subjects whose personal data are processed by the Operator:

- tourism product customers — a tourist or another person ordering a tourism product on behalf of a tourist, including the legal representative of a minor tourist;
- tourist — an individual visiting a country (place) of temporary residence in medical, recreational, educational, educational, sports, professional, business, religious and other purposes without engaging in activities related to income from sources in the country (place) of temporary residence for a period of 24 hours through 6 months in a row or at least one overnight stay in the country (place) of temporary residence;
- passenger — an individual to whom the carrier undertakes to provide transportation services on the basis of documents drawn up by the Operator;
- individuals that are in labour relations with the Company;
- individuals that quit the Company;
- individuals that are applicants for positions in the Company;
- individuals who are in civil law relations with the Company.

3.2.4. Personal data that are processed by the Operator:

- personal data of customers and tourists, to the extent necessary for booking tourism services included in the tourism product, sold under agreements on the sale of a tourism product;
- personal data of tourists, in the amount necessary for the preparation of tourist documents confirming the right of tourists to receive tourism services that are part of the tourism product sold under agreements on the sale of a tourism product;
- data obtained as part of the performance of obligations under employment agreements;
- data obtained in order to select candidates for working positions;
- data obtained at the conclusion of civil law agreements and used as part of the performance of obligations under the concluded agreements.

3.2.5. The processing of personal data is carried out:

- using automation tools;
- without using automation tools.

3.3. Storage of personal data.

3.3.1. Personal data of personal data subjects can be obtained, undergo further processing and can be transferred to storage both on paper and in electronic form.

3.3.2. Personal data of personal data subjects recorded on paper are stored in locked cabinets or in locked rooms with a limited right of access.

3.3.3. Personal data of personal data subjects processed using automation tools are processed and stored in compliance with the requirements established by Decree of the Government of the Russian Federation No. 1119 “On approval of the requirements for the protection of personal data during their processing in personal data information systems” dated 01/11/2012.

3.3.4. Storage and placement of documents containing personal data in open electronic directories (file sharing) in personal data information systems is not allowed.

3.3.5. The storage of personal data in a form that allows others to determine the subject of personal data is carried out no longer than the purpose of their processing requires. Personal data are subject to destruction upon achievement of the purposes of processing personal data or in the event of the loss of the need to use them to achieve the purpose of their processing.

3.4. Destruction of personal data.

3.4.1. Destruction of documents (carriers) containing personal data is carried out by burning, crushing (grinding), chemical decomposition, transformation into a shapeless mass or powder. For the destruction of paper documents, the use of a shredder is allowed.

3.4.2. Personal data on electronic media is destroyed by erasing or formatting the media.

3.4.3. The fact of the destruction of personal data is documented by the act on the destruction of the media.

3.5. Transfer of personal data.

3.5.1. The Operator transfers personal data to third parties in the following cases:

- written consent for such actions has been received from the subject of personal data;
- the transfer is provided for by Russian or other applicable legislation within the framework of the procedure established by law.

3.5.2. The list of individuals to whom personal data are transferred.

3.5.2.1. Third parties to whom personal data are transferred as part of the fulfilment of obligations related to the implementation and execution of tourism services included in the tourism product:

- tour operators developing a tourism product;
- direct executors of tourism services that are part of the tourism product, or providing individual tourism services (accommodation facilities, carriers, insurance companies, consulates and embassies of foreign countries that process visas, excursion bureaus, etc.).

Cross-border transfer of personal data is carried out taking into account the requirements established by Article 12 of Federal Law No. 152-FZ “On Personal Data” dated July 27, 2006.

3.5.2.2. Third parties to whom personal data are transferred as part of the performance of obligations related to labour relations:

- Pension Fund of the Russian Federation for record-keeping (legally);
- tax authorities of the Russian Federation (legally);
- Social Insurance Fund of the Russian Federation (legally);
- territorial fund of compulsory medical insurance (legally);
- insurance medical organizations for compulsory and voluntary medical insurance (legally);
- banks for payroll (based on the agreement);
- Ministry of Internal Affairs of Russia in cases established by law.

4. Protection of personal data

4.1. In accordance with the requirements of regulatory documents, the Operator has created a personal data protection system consisting of subsystems of legal, organizational and technical protection.

4.2. The legal protection subsystem is a set of legal, organizational, administrative and regulatory documents that ensure the creation, operation and improvement of personal data protection systems.

4.3. The organizational protection subsystem includes the organization of the management structure of personal data protection systems, a licensing system, and information protection when working with employees, partners, and third parties.

4.4. The technical protection subsystem includes a set of technical, software and hardware tools that protect personal data.

4.5. The main personal data protection measures used by the Operator are:

4.5.1. Appointment of a person responsible for the processing of personal data, who organizes the processing of personal data, training and briefing, internal control over compliance by the Company and its employees with requirements for the protection of personal data.

4.5.2. Identification of current threats to the security of personal data during their processing in personal data information systems and development of means and measures to protect personal data.

4.5.3. Developing a policy regarding personal data processing.

4.5.4. Establishment of rules for access to personal data processed in personal data information systems, as well as ensuring registration and record-keeping of all actions performed with personal data in personal data information systems.

4.5.5. Creating individual passwords for employees to access the information system in accordance with their official duties.

4.5.6. Application of information protection means that have been duly assessed.

4.5.7. Certified antivirus software with regularly updated databases.

4.5.8. Compliance with the conditions ensuring personal data safety and protecting from unauthorized access to them.

4.5.9. Detection of cases of unauthorized access to personal data and taking subsequent measures.

4.5.10. Recovery of personal data modified or destroyed due to unauthorized access to them.

4.5.11. Training of the Operator's employees, who are directly responsible for personal data processing, to apply the provisions of laws of the Russian Federation on personal data, including the requirements for the protection of personal data, documents that determine the Operator's policy regarding the processing of personal data, local acts on the processing of personal data.

4.5.12. Implementation of internal control and audit.

5. Basic rights of the subject of personal data and obligations of the Operator

5.1. Basic rights of the subject of personal data.

The subject of personal data has the right to receive information regarding the processing of his or her personal data, including those that contain:

- 1) confirmation of the fact of processing personal data by the operator;
- 2) legal grounds and purposes of processing personal data;
- 3) purposes and methods used by the operator for processing personal data;
- 4) name and location of the operator, information about the individuals (with the exception of the operator's employees) that have access to personal data or to whom personal data may be disclosed on the basis of an agreement with the operator or on the basis of the Federal Law;
- 5) processed personal data relating to the relevant subject of personal data, the source of their receipt, unless another procedure of providing such data is established by the Federal Law;
- 6) timelines for processing personal data, including periods for their storage;
- 7) the procedure for the exercise by the subject of personal data of the rights provided for by the applicable laws of the Russian Federation;
- 8) information on the implementation or suspected cross-border transfer of personal data;
- 9) name of the legal entity or surname, name, patronymic and address of the individual that processes personal data on behalf of the operator, in case processing is or will be entrusted to such a person;
- 10) other information provided by this Federal Law or other federal laws.

5.2. Responsibilities of the Operator.

The Operator must:

1) when contacting the subject of personal data, provide information on the processing of personal data;

2) in cases when personal data were received not from the subject of personal data, notify the subject of personal data about the fact of receipt of personal data by the Operator;

3) in case of refusal to provide personal data, explain to the subject of personal data the consequences of such refusal;

4) publish or otherwise provide unrestricted access to a document defining the Operator's policy regarding personal data processing;

5) take the necessary legal, organizational and technical measures or ensure their adoption to protect personal data from unlawful or accidental access to them, destruction, modification, blocking, copying, provision, distribution of personal data, as well as from other illegal actions in relation to personal data;

give answers to requests and appeals of personal data subjects, their representatives and the authorized body for the protection of the rights of personal data subjects.