



Privacy Policy

We are pleased that you are visiting our homepage and thank you for your interest in our company. Dealing with our customers and interested parties is a matter of trust. The trust placed in us is very important to us and therefore the importance and obligation to handle your data carefully and to protect them from misuse.

With these notes on data protection, we inform you about when we store which data and how we use it - naturally in compliance with the applicable legislation. Data protection at AZIMUT Hotels is based in particular on the European General Data Protection Regulation (GDPR) and the Federal Data Protection Act (BDSG).

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Responsible

Responsible for this website is:

AZIMUT Hotels Company LLC, Olympiyskiy prospect 18/1, Moscow, 129110 Russia
Tel: +7(495)994 44 50, Mail: info@azimuthotels.com

Data Protection Officer

The data protection officer of the Responsible is:

Berit Schubert, DataSolution LUD GmbH, Isarstr. 13, D-14974 Ludwigsfelde, Germany,
Tel.: +49 (0) 3378 205729, Mail: mail@hoteldatenschutz.de

Legal basis of the data processing

In order to be able to offer you our website and the associated services, we process personal data on the basis of the following legal basis:

- **consent** (Art. 6 Abs. 1 lit. a) GDPR)
- for the **fulfilment of contracts** (Art. 6 Abs. 1 lit. b) GDPR)
- on the basis of **legitimate interest** (Art. 6 Abs. 1 lit. f) GDPR)
- for the fulfilment of **legal obligations** (Art. 6 Abs. 1 lit. c) GDPR)

We will refer to the relevant terms in connection with the respective processing, so that you can classify on which basis we process personal data.

If personal data are processed on the basis of your consent, you have the right to **revoke** this **consent** at any time with effect for the future.

If we process data on the basis of a **legitimate interest**, you as the data subject have the **right to object** to the processing of personal data, taking into account the provisions of Art. 21 DSGVO.

Providing the website

Personal data is processed when you visit our website in order to be able to display the contents of the website on your terminal device.

In order for the pages to be displayed in your browser, the IP address of the terminal device used by you must be processed. Additional information about the browser of your mobile device is also required.

We are obliged under data protection law to also guarantee the confidentiality and integrity of the personal data processed with our IT systems.

For this purpose and out of this interest, the following data is recorded on the basis of a weighing of interests:

- IP address of the calling computer (for maximum 7 days)
- Operating system of the calling computer



- Browser version of the calling computer
- Name of the retrieved file
- Date and time of retrieval
- data volume transferred
- Referring URL

The IP address will be deleted after 7 days at the latest from all systems used in connection with the operation of this website. We can then no longer establish a personal reference from the remaining data. The data is also used to identify and correct errors on the website.

Contact/E-Mail contact

We offer a contact form on our website, which you can use to request information about our products or services or to contact us in general. We have marked the data that is absolutely necessary for you to answer an inquiry as mandatory. Information on other data fields is voluntary.

We need this information in order to process your request, to address you correctly and to send you an answer. The data processing is carried out in the case of concrete inquiries for the fulfilment of a contract or the initiation of a contract. In the case of general enquiries, the processing is based on our legitimate interest.

Enquiries received via the contact form on our website are processed electronically by us in order to respond to your request. In this context, other persons or departments and possibly third parties may also become aware of the contents of the form you have sent. Die Übermittlung der Formular-Daten über das Internet erfolgt über verschlüsselte Verbindungen.

Online booking via the website

When enquiries/bookings are made and during the stay in the hotel, inventory data required for mutual, proper fulfilment of the contract. These include: Salutation, first name and surname, address, street and city, date of birth, telephone numbers and/or e-mail addresses, payment data (credit card), data on services.

When you make a booking, it will be processed through the TravelClick, Inc. online reservation system, address: 7 Times Square, 38th Floor, New York, USA. All the booking data you enter is transmitted in encrypted form. Our contract partner has committed itself to handling your transmitted data in accordance with data protection laws. It takes all organizational and technical measures to protect your data.

The data is used exclusively for the processing of the booking and for communication.

In order to increase our services, we manage all received data in our CRM system. The hotel in which the booking is made is responsible for this. The respective booking data is transferred from the hotel software to the CRM system and can only be viewed by the responsible party and central functionalities. The CRM system is operated by AZIMUT Hotels Company LLC at 18/1, Olympiyskiy Avenue, 129110 Moskau, Russia. Together, the access to the master data of a guest is used, for example, to make a reservation for another hotel at a later date, to rebook or to carry out marketing activities centrally. Central services such as reservation and marketing access this data.

Online booking via other websites

AZIMUT Hotels gives interested parties the opportunity to book rooms and arrangements through hotel reservation portals (third-party providers). If a user takes advantage of this opportunity, the data



entered in the input mask is transmitted to us and stored to the extent permitted by the respective hotel reservation portal in accordance with its own data protection regulations. Data can be: first name, surname, e-mail address, telephone, address, number of fellow travellers, estimated time of arrival, requests, payment data (credit card).

The data provided is transferred to our hotel software via a so-called channel manager. All received booking data are transmitted encrypted. TravelClick, Inc., address: 7 Times Square, 38th Floor, New York, USA as provider of the channel manager has committed itself to handling the transmitted personal data in a data protection-compliant manner. It takes all organizational and technical measures to protect your data.

The data will be used exclusively for processing the booking and, if necessary, for communication.

In order to increase our services, we manage all received data in our CRM system. The hotel in which the booking is made is responsible for this. The respective booking data is transferred from the hotel software to the CRM system and can only be viewed by the responsible party and central functionalities. The CRM system is operated by AZIMUT Hotels Company LLC at 18/1, Olympiyskiy Avenue, 129110 Moskau, Russia. Together, the access to the master data of a guest is used, for example, to make a reservation for another hotel at a later date, to rebook or to carry out marketing activities centrally. Central services such as reservation and marketing access this data.

Purchase a voucher via the website

On our website there is the possibility to buy vouchers. If a user takes advantage of this possibility, the data entered in the input mask is transmitted to us and stored. These data are: Name, first name, e-mail address, telephone, voucher value, wishes, payment data.

All order data entered by you will be transmitted encrypted. In this context, the data will not be passed on to third parties. The data is used exclusively for booking purposes and communication.

The deletion of the credit card data takes place promptly after the voucher amount has been paid off.

Newsletterservice

On our website you have the possibility to register for our newsletter service in different ways. If a user takes advantage of this option, the data entered in the input mask will be transmitted to us and stored. These data are: E-mail address, form of address, first name, surname.

If you register for a newsletter from our websites, the data will be stored in our newsletter tool of Revinate Inc, 1 Letterman Drive Building C, Suite CM 100, 94129 San Francisco, California, USA. Revinate Inc. has committed itself to handling your transmitted data in accordance with data protection laws. It takes all organisational and technical measures to protect your data.

Should we otherwise receive an e-mail address where the recipient clearly informs us that he/she wishes to receive our newsletter, we will collect his/her data via the input mask on our website. Die Daten werden ausschließlich für das Versenden von Newslettern verwendet.

The recipient has the possibility to object to the processing of his personal data at any time. With each newsletter the recipient can unsubscribe from the newsletter service.

AZIMUT Loyalty-Program

On our website there is the possibility to register for our loyalty program. If a user takes advantage of this opportunity, the data entered in the input mask is transmitted to us and stored. These data are: E-mail address, form of address, first name, surname. In addition, customer number, day and time of



registration, private address, date of birth, reservation history including the collected bonus points and special requests are stored. Legal basis is the consent of the user.

Your data will be stored in our CRM system. The loyalty program is operated by AZIMUT Hotels Company LLC at 18/1, Olympiyskiy Avenue, 129110 Moscow, Russia, and is used for central promotional activities (such as newsletters for subscribers to the loyalty program).

The data will be deleted as soon as you have logged out of the loyalty programme and as soon as national, commercial, statutory or contractual retention requirements are fulfilled.

Business customers

For the support, advice and advertising of corporate customers, we collect and use the contact person, telephone number and postal address in addition to the business partner or potential business partner. We obtain the information from various sources, either through an inquiry (e-mail or telephone), but also through events, trade fairs, business cards received by our sales staff, etc.

We use these contact details exclusively for our own purposes and for the needs-based design of our own sales activities. You can object to the use of your e-mail address for direct advertising at any time.

Online evaluation and surveys

Former guests can give a rating to our hotel after check-out or participate in a survey. For this purpose, we would like to send you an e-mail within 14 days after departure to ask you to submit a hotel rating or to participate in a survey. For this purpose we use the service provider Revinate Inc, 1 Letterman Drive Building C, Suite CM 100, 94129 San Francisco, California, USA. Each rating can be published anonymously if desired. If you did not feel comfortable in one of our hotels, we would like to take the opportunity to contact you.

We have also integrated the hotel rating software from Tripadvisor on our own hotel websites. Former guests can submit an anonymous rating to our hotel after check-out. For this purpose, we would like to send you an e-mail within 14 days after departure to ask you to submit a hotel rating.

We use the service provider Revinate Inc. to send the evaluation e-mail. Every evaluation can be published anonymously if desired. If you did not feel comfortable in one of our hotels, we would like to take the opportunity to contact you.

In this context, the data will not be passed on to third parties. The data will be used exclusively for the publication of the evaluation and for arbitration in case of bad evaluations.

You can object to the use of your data for the online evaluation at any time.

Application for a job advertisement

On our website and via internet portals, there is the possibility to apply for advertised positions. If an applicant takes this opportunity, the data transmitted to us can be processed electronically. These data are among others:

- Form of address, first name, surname
- Contact details (e-mail address, telephone)
- Cover letter
- File attachment with the detailed application

In this context, the data will initially not be passed on to third parties. However, should an applicant fit the profile of another job advertisement published by one of our affiliated companies, we will gladly forward the application documents. We will obtain the consent of the applicant in advance. The data



will otherwise be used exclusively for the processing of the application by the specialist department and for communication purposes.

Cookies

Cookies are used on our Internet pages. Cookies are small pieces of text information that are stored in your terminal device via your browser. The cookies are required to enable certain functions of our website.

We use the following cookies on our site:

Name	Purpose	Expiry	Type
BITRIX_SM_SELECTED_CUR-RENCY	This cookie remembers the currency of the user	1 year	HTTP
_hbi widget hb	HBI widget is from HotelsBI - the provider of the loyalty program	1 year	HTTP
Google G_ENABLED_IDPS	Webanalysis	unrestricted	HTTP

In addition, we use the Seekda Metasearch Interface of the company Kognitiv, 92 King St. S., Unit 201, Waterloo, Ontario Canada N2J 1P5 on our website. The service connects our website with numerous search engines and booking portals to target our web services.

All the above-mentioned cookies are absolutely necessary for the operation of our website. The use of cookies that are not absolutely necessary is only possible with your consent. In these cases, a corresponding consent form will be displayed on the website.

You have the option of preventing the setting of cookies by making the appropriate settings in your browser. However, we would like to point out that the use of our website may then only be possible to a limited extent. No programs or other applications are installed or started on your computer by cookies.

The use of cookies is based on a weighing of interests. Our interest is the user-friendly visit of our website.

Webanalysis

Use of Google Analytics

Our offer uses Google Analytics, a web analysis service of Google Inc. ("Google"). Google Analytics uses so-called "cookies", text files that are stored on the user's computer and which enable an analysis of their use of the website. The information generated by the cookie about the use of the website by the user is usually transferred to a Google server in the USA and stored there. However, if IP anonymisation is activated on this website, the IP address of Google's users within member states of the European Union or in other signatory states to the Agreement on the European Economic Area will be shortened beforehand. Only in exceptional cases will the full IP address be transferred to a Google server in the USA and shortened there.

IP anonymization is active on this website. On behalf of the operator of this website, Google will use this information to evaluate the use of the website by the user, to compile reports on the website activities and to provide further services to the website operator in connection with the use of the



website and the Internet. The IP address transmitted by your browser within the framework of Google Analytics is not combined with other data from Google. Users can prevent the storage of cookies by adjusting their browser software settings accordingly; however, this offer points out to users that in this case they may not be able to use all the functions of this website to their full extent. Furthermore, users can prevent the collection of the data generated by the cookie and related to their use of the website (including their IP address) to Google and the processing of this data by Google by downloading and installing the browser plugin available at the following link:

Google in the USA is certified according to the so-called "Privacy Shield" (list entry). An adequate level of data protection is guaranteed by Google.

You can prevent the collection of the data generated by the cookie and related to your use of the website (including your IP address) to Google and the processing of this data by Google by downloading and installing the browser plugin available at the following link (<http://tools.google.com/dlpage/gaoptout?hl=de>).

You can find more information on the terms of use of Google Analytics and on privacy notices at: <https://policies.google.com/privacy>

Use of Yandex Metrica (Yandex LLC)

Our offer uses Yandex Metrica, a web channel system service of Yandex LLC ,16 Lva Tolstogo str., Moscow, 119021, Russia (www.yandex.com). With the help of Yandex Metrica pseudonymized visitor data is collected, evaluated and stored on the basis of our legitimate interest in statistical analysis of user behavior for optimization and marketing purposes in accordance with Art. 6 paragraph 1 letter f DSGVO. Pseudonymised user profiles can be created and evaluated from this data for the same purpose. Yandex Metrica uses so-called "cookies", i.e. small text files that are stored locally in the cache of the Internet browser of the site visitor. These cookies serve, among other things, to recognize the browser and thus enable a more precise determination of statistical data. The user's IP address is part of the information collected, but is pseudonymised immediately after the collection and before it is stored, in order to exclude the possibility of a personal reference.

The information generated by the cookie (including the pseudonymized IP address) is transferred to a Yandex server in the Russian Federation and stored there to protect the above interests.

The data collected using Yandex technologies will not be used at any time to personally identify the visitor to this website without the separate consent of the person concerned, and will not be merged with personal data about the bearer of the pseudonym.

Wenn Sie die Auswertung des Nutzerverhaltens via Cookies deaktivieren möchten, können Sie Ihren Browser so einstellen, dass Sie über das Setzen von Cookies informiert werden und einzeln über deren Annahme entscheiden oder die Annahme von Cookies für bestimmte Fälle oder generell ausschließen.

Use of Triptease

On our web site we use the service of the Triptease Group (Triptease Ltd., based in the UK, Triptease Inc., based in the USA). With the help of Triptease, pseudonymous visitor data is collected, evaluated and stored based on our legitimate interest in the statistical analysis of user behavior for optimization and marketing purposes. With the help of the Triptease service you will be shown offers and promotions, among other things. From this data, pseudonymized user profiles can be created and evaluated for the same purpose. The user's IP address is part of the collected information, but is pseudonymised immediately after the collection and before it is stored in order to exclude the possibility of personal reference. We collect further personal data such as your e-mail address only with your consent.



Further information on how Triptease processes your data can be found here:

<https://www.triptease.com/en/privacy-policy/>

Use of Social Plugins

Facebook-Button

On our pages we have integrated a button of the social network Facebook, 1601 South California Avenue, Palo Alto, CA 94304, USA. The Facebook button leads the user via a link to our Facebook fan page. No data is transferred from our website to Facebook when the user visits our website.

If you click on the Facebook button while you are logged in to your Facebook account, you can link the contents of our pages on your Facebook profile. This allows Facebook to associate visits to our Pages with your user account. We would like to point out that we, as the provider of the Pages, have no knowledge of the content of the transmitted data or its use by Facebook.

You can find more information on this in the Facebook privacy policy at de-de.facebook.com/policy.php If you do not want Facebook to be able to assign visits to our pages to your Facebook user account, please log out of your Facebook user account.

Instagram-Button

On our pages we have included a button of the service Instagram. These functions are offered by Instagram Inc, 1601 Willow Road, Menlo Park, CA, 94025, USA. If you are logged into your Instagram account, you can link the content of our site to your Instagram profile by clicking the Instagram button. This allows Instagram to associate your visit to our site with your account. We would like to point out that we, as the provider of the pages, have no knowledge of the content of the transmitted data and its use by Instagram.

For more information, please see the Instagram Privacy Policy: <http://instagram.com/about/legal/privacy/>

VK.com Button

On our pages we have a button of the service vk.com (LLC "V contacts" prem. 1-N, bld. 12-14, Lit. A, Khersonskaya st., 191024 St. Petersburg, Russian Federation). When you access our pages with vk.com plug-ins, a connection is established between your browser and the vk.com servers. In the process, data is already transferred to vk.com, which enables vk.com to assign visits to our pages to your user account. We would like to point out that we, as the provider of the pages, have no knowledge of the content of the transmitted data or of the use of such data by vk.com.

If you do not wish this data to be allocated to your vk account, please log out of vk.com before visiting our site. You can find out more at <https://vk.com/terms>

Facebook-Fanpage

On our Facebook fan page we use plugins from the provider Facebook.com, which are provided by the company Facebook Inc. 1601 S. California Avenue, Palo Alto, CA 94304 in the USA. By using the fan page, data is forwarded to the Facebook servers, which contain information about your visits to our fan page. For logged in Facebook users this means that the usage data is assigned to their personal Facebook account. As soon as you as a logged in Facebook user actively use the Facebook plugin (e.g. by clicking the "Like" button or using the comment function), this data is transferred to your Facebook account and published. You can only avoid this by logging out of your Facebook account first.



We do not know exactly what data Facebook stores and uses. As a user of the fan page, you must therefore expect that Facebook will also store your actions on the fan page without any gaps.

Facebook receives your IP address, processor type and browser version by clicking on the "Like" button. Using your IP address, Facebook could, together with other data and your real name, if you have entered it in your Facebook profile, determine your identity and habits under this profile. If you always log in to Facebook via this user profile, Facebook could find out your preferences, contacts and lifestyle in particular.

Furthermore, the General Terms of Use of Facebook Ireland Limited, Hanover Reach, 5-7 Hanover Quay, Dublin 2, Ireland apply at <https://www.facebook.com/terms.php>

Regarding data protection on Facebook, please note the following privacy policy of Facebook Ireland Limited: <https://www.facebook.com/about/privacy/>

Integration of third-party services and content

Within our online offer, we use content or service offers from third parties on the basis of our legitimate interests in order to integrate their content and services, such as videos or fonts (hereinafter uniformly referred to as "content"). This always presupposes that the third party providers of these contents are aware of the IP address of the users, as without the IP address they would not be able to send the contents to their browsers. The IP address is therefore necessary for the display of this content.

The following contents are used on this website:

- External Fonts from Google, LLC., <https://www.google.com/fonts> ("Google Fonts"). Google Fonts are integrated by a server call to Google (usually in the USA). Privacy policy: <https://policies.google.com/privacy>, Opt-Out: <https://adssettings.google.com/authenticated>.
- Maps of the service "Google Maps" provided by the third-party provider Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA. Privacy Policy: <https://www.google.com/policies/privacy/>, Opt-Out: <https://www.google.com/settings/ads/>.

Purposes of the processing of personal data

We process the aforementioned data for the operation of our website and for the fulfilment of contractual obligations to our customers or for the protection of our legitimate interests.

In the case of enquiries from you outside an active customer relationship, we process the data for the purposes of sales and advertising. You can object to the use of your personal data for advertising purposes at any time.

Voluntary information

If you provide us with data voluntarily, e.g. in forms, and this data is not required for the fulfilment of our contractual obligations, we process this data on the justified assumption that the processing and use of this data is in your interest.

Recipient / transfer of data



Data that you provide to us will not be passed on to third parties. In particular, your data will not be passed on to third parties for their advertising purposes.

However, we may use service providers for the operation of this website or for further products or services from us. Here it can happen that a service provider gets knowledge of personal data. We select our service providers carefully - especially with regard to data protection and data security - and take all measures required by data protection law for permissible data processing.

Data processing outside the European Union

Insofar as personal data is processed outside the European Union, this can be seen from the above explanations.

Protection of minors

This service is mainly aimed at adults. We do not currently market special areas for children. Accordingly, we do not knowingly collect age verification information, nor do we knowingly collect personal information from children under the age of 16. However, we remind all visitors to our website under the age of 16 not to disclose or provide any personally identifiable information through our service. In the event that we discover that a child under the age of 16 has provided us with personal information, we will delete the child's personal information from our files to the extent technically feasible.

Rights of the data subject

You have the right of **access** to personal data concerning you. You can contact us for information at any time.

In the case of a request for information that is not made in writing, we ask for your understanding that we may require you to provide proof that you are the person you claim to be.

Furthermore, you have a right to **correction** or **deletion** or to restriction of processing, insofar as you are legally entitled to this.

Finally, you have a right of **objection** against the processing within the framework of the legal requirements.

A right to data **transferability** also exists within the framework of data protection regulations.

If you have any questions regarding your rights and the exercise of your rights, please contact the [responsible body](#) or our [data protection officer](#).

Deletion of data

As a matter of principle, we delete personal data when there is no need for further storage. A requirement can exist in particular if the data is still needed to fulfil contractual services, to check and grant or ward off warranty and, if applicable, guarantee claims. In the case of legal storage obligations, deletion is only possible after the expiry of the respective storage obligation..

Security

AZIMUT Hotels uses technical and organizational security measures in accordance with Art. 32 DSGVO to protect your data managed by us against accidental or intentional manipulation, loss, destruction or access by unauthorized persons. Our security measures are continuously improved in line with tech-



nological developments. Access to this data is only possible for a few authorized persons who are responsible for the technical, administrative or editorial maintenance of data and who are obliged to observe data protection regulations.

Right of appeal to a supervisory authority

You have the right to complain to a data protection supervisory authority about the processing of personal data by us.

Amendment of this privacy policy

We will revise this privacy policy whenever changes are made to this website or other reasons that make this necessary. You will always find the current version on this website.

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