

STATEMENT OF PRIVACY OF UA HOTEL ALLIANCE LCC

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This Statement of Privacy of UA HOTEL ALLIANCE LCC (UA HOTEL ALLIANCE). Throughout the world, guests of the hotels united under the umbrella brand UA HOTEL ALLIANCE LCC are provided with services, products and accommodation conditions of premium quality. We highly respect your business and appreciate your trust. We understand the importance of confidentiality. Therefore, we have developed this Statement to explain our rules regarding personal data received in oral or written form or provided when visiting this website, our hotels or from other sources. Although this Statement summarizes the rules adopted in the hotels united under the umbrella brand UA HOTEL ALLIANCE LCC throughout the world, the local laws are changing and some jurisdictions may restrict our data processing activities. Thus, our actual rules in these jurisdictions may be more restricted than those described in this Statement to ensure the compliance with local requirements. If you are a resident of the European Economic Area (EEA), please read Appendix 1 hereto for further information about the use of your personal data by UA HOTEL ALLIANCE LCC.

By using any of our products or services and/or by agreeing to this Statement you understand and give your consent to collection and use of your personal data in accordance with the information set forth in this Statement.

Please note that this Statement does not apply to processing of personal data on behalf of, or on the instruction of third-party companies and service providers.

You can learn about the hotels united under the umbrella brand UA HOTEL ALLIANCE LCC by following the link: <https://reikartz.com/ru/hotels/>
UA HOTEL ALLIANCE LCC is a management company controlling all information about the guests using Servio HMS and HMS Loyalty programs. All hotels included in the portfolio of umbrella brand UA HOTEL ALLIANCE LCC use Servio HMS and HMS Loyalty programs.

1. Personal data collected UA HOTEL ALLIANCE LCC

UA HOTEL ALLIANCE LCC Limited Liability Company collects personal data when communicating with guests and other contact persons, in the course of doing business, as well as using Servio HMS and HMS Loyalty programs. Such personal data may include your name/surname, postal address, billing address, e-mail, phone number, booking information, information about booking, accommodation or visiting a hotel; information about participation in contests, lotteries or marketing programs (even if you did not stay in one of our hotels); information about purchased products or services; personal data: nationality, income, passport number, issuance place and date; information about travel; information about payments, such as number and other details of your payment card, as well as authentication information and other login account data related to your mobile accounts; information about your preferences when choosing a room; information about the amount of marketing information you want to receive; information about cars which you can use to arrive at our hotels; summary and opinions about our brands or hotels (if they are identified or related to you); ordered service packages that include hotel booking; groups you are related to while staying at the

hotel; information provided in connection with participation in loyalty program; other information provided by you or received by us about you.

UA HOTEL ALLIANCE LCC can request information about tourist groups, including names and phone numbers of program participants. We can also collect information related to conversations, including registration or monitoring of customer service calls for the purposes of quality control and training, and other types of communications, such as in-app messages or SMS messages.

In addition, UA HOTEL ALLIANCE LCC may require additional personal data in the following cases:

- Participation in loyalty UA HOTEL ALLIANCE LCC. Each loyalty program offers special conditions and maximum benefits not only for tourists who choose hotels of our network as a place of their vacation, but also for corporate clients who appreciate fast check-in and easy use. If you participate in loyalty programs, UA HOTEL ALLIANCE LCC collects data for participation in loyalty programs: your name, gender, personal and business contact information, position, date of birth, country and city of residence, company name; information about your login account and registration data in loyalty programs; information, feedback or content, provided by you information about your attitude to marketing benefits, your participation in surveys, lotteries, contests or promotional events on our websites or in apps, as well as similar information about third parties; information gathered while staying at the hotel or by using video surveillance systems in places of public use, Internet systems (including wireless networks collecting information about your computer or mobile device, or about your whereabouts), key cards and other security systems and technologies; information gathered when visiting the website; contact details and other relevant information about employees of corporate clients and service providers, as well as about other persons whom we cooperate with.
- Surveys. During surveys, UA HOTEL ALLIANCE LCC may need demographic or other personal data.
- Collection of information in the hotel. Sometimes, according to the requirements of local laws UA HOTEL ALLIANCE LCC may demand additional personal data when you check into the hotel. In the hotels, we can use a video surveillance system and other security devices allowing to capture and record images of guests and visitors in places of public use, as well as information related to your whereabouts in our hotels (using key cards and other devices). We can also use a video surveillance system and other technologies recording sound or video to protect our employees, guests and visitors of our hotels in legally prescribed cases. In addition, we may need additional information to provide a range of services at the hotel: visiting spa centers, arranging events.
- Profiles of events. When planning an event, UA HOTEL ALLIANCE LCC shall register information about the event or meeting, date, number of guests, description of rooms. When holding corporate events, we will need information about organization: name, annual budget, number of activities financed during the year. We also collect information about guests who are members of your group or take part in the event. If you are visiting us as part of the group, we may have in our disposal your personal data provided by the group and may contact you after your visit as part of the group or participation in the event at your discretion in legally prescribed cases. If you visit us within the framework of the event, in legally prescribed cases, we may provide your personal data to event organizers. If you are organizing an event, we may also share information about your event with third-party service providers who may offer services for the event in legally prescribed cases.

- **Social media.** If you want to participate in the events and promotions held by UA HOTEL ALLIANCE LCC in social media, we may need some information from your login account in social media: whereabouts, hotel bookings, participation in the events, interests, photos, status changes and friends list. UA HOTEL ALLIANCE LCC can also allow you to take part in the contests with photos, for example, made during your stay at our hotel, which you can post in social media for voting, showing or participating in other promotions.

In addition to information received by UA HOTEL ALLIANCE LCC directly from you, we may also create information about you based on provided by you data or other collected by us information.

2. Personal data received by UA HOTEL ALLIANCE LCC from third-party companies

UA HOTEL ALLIANCE LCC may also receive information about you from third parties, including information from tour operators and travel agents, payment card servicing companies and other partners, from social media in accordance with your settings related to such services, as well as from other third-party sources that may provide us with information about you in accordance with the law. UA HOTEL ALLIANCE LCC can use and provide this information (and also integrate it with other information about you available to us) for the purposes stated in this Statement.

3. Using your personal data by UA HOTEL ALLIANCE LCC

UA HOTEL ALLIANCE LCC uses your personal data in a variety of ways, including for the provision and personalization of services you request and expect from us to offer you the highest level of service which you expect in the room and in all hotels of our network, to manage loyalty programs, implement measures of direct marketing and sales according to the below detailed description. Before processing your data we obtain your consent, if this is required by the applicable law.

UA HOTEL ALLIANCE LCC shall collect certain data, including your name/surname, address, payment information, and in some countries – information about travel documents to process your booking. In case of refusal to provide necessary information we will not be able to arrange your booking.

- **Participants of loyalty programs** UA HOTEL ALLIANCE LCC uses your data to identify, manage loyalty programs to provide an individualized approach through our services to transfer news, advertising and business materials to various services of UA HOTEL ALLIANCE LCC, as well as to personalize advertising and contents delivered to you through the Internet, e-mail, mobile devices, media advertising means, as well as on our website in the apps and through our customer support service in accordance with your preferences regarding communication means. UA HOTEL ALLIANCE LCC also uses your data in case of your participation in loyalty programs, in order to:
 - ensure activation, personalized operation of card products and application of loyalty program conditions when booking and checking into the hotels included in the portfolio of umbrella brand UA HOTEL ALLIANCE LCC;
 - ensure more personalized services, in particular, provide you with third-party information and services (for example, additional hotel services, visiting local memorial places and an opportunity to arrange transfers);
 - conduct market research, surveys to determine your level of satisfaction with quality of

services and provide the highest quality of service to our clients;

- conduct targeted marketing and arrange advertising campaigns;
- respond to requests for information and services, including third party services (for example, restaurants or transport companies);
- provide your safety and security in the hotel, as well as safety and security of the staff and other guests of the hotel;
- maintain general documentation;
- ensure compliance with the requirements of Ukrainian law and rules adopted in accordance therewith;
- provide an opportunity to test, evaluate and introduce new products and services.

- Administrative management of services. UA HOTEL ALLIANCE LCC uses your personal data for the purpose of administrative management of programs, including by giving you an access to information about your login account, for example, bonus balance and offers you are entitled to; to provide services within the framework of such program; to create a direct link between hotels united under the umbrella brand UA HOTEL ALLIANCE LCC and between hotels united under the umbrella brand UA HOTEL ALLIANCE LCC and you; as well as to simplify the process of data collection.
- Organization of business meetings and events. UA HOTEL ALLIANCE LCC can use personal data to provide you with information about scheduled meetings and events.
- Marketing and communication. In the allowed cases, UA HOTEL ALLIANCE LCC may use your personal data to provide or offer you a subscription for mailing lists, promotions and special offers, as well as other marketing communications in accordance with the preferences you have indicated regarding communication means. We use your data to send messages during your stay, confirm bookings, forward marketing messages, and conduct surveys, lotteries, prize drawings and other contests. We can send these messages to e-mails, by regular mail, via Internet, social media, by phone, in the form of text message (including SMS and MMS), push messages, in-app messages, as well as using other means (including sending messages in the hotel, for example, using TV system in your room). With your consent, we also use your content (for example, photos) from social media to send media advertising, as well as on our website and in the apps. We may also collect information about your payment card that may be added to your personal data and used by us or our business partners to determine type of your card. We may also cooperate with third-party companies to determine whether a visitor of our website has taken advantage of the offer to get refund for his payment card, and to provide visitors with advertising information explaining how to use this offer when staying at the hotel which is included in the brand portfolio of UA HOTEL ALLIANCE LCC.
- Improvement of service quality. UA HOTEL ALLIANCE LCC can use your personal data in order to improve quality of services so that our website, products and services will be of interest to you. We also use your personal data in order to provide you with an expected level of service in the room and in all hotels of our network.
- Data accuracy, analytics and personalization. UA HOTEL ALLIANCE LCC can integrate your personal data with data from third-party sources for the purpose of systematization and data analysis. We also use information from third-party sources to provide a higher level of service with an individual approach to each guest. For example, if you have connected social media services or other login accounts to our services, we may use this information in order to provide you a warmer reception and an individual approach, or to provide it to third-party companies and use it in accordance with any clause of this Statement.

4. Personal data provided by UA HOTEL ALLIANCE LCC LLC to third-party companies

In order to offer you the highest level of service in accordance with your expectations, UA HOTEL ALLIANCE LCC LLC can provide your personal data to hotels united under the umbrella brand UA HOTEL ALLIANCE LCC, our service providers, third-party companies and other third parties in accordance with the below explanation:

- Hotels united under the umbrella brand UA HOTEL ALLIANCE LCC, including hotels under management. UA HOTEL ALLIANCE LLC can provide personal data to hotels united under the umbrella brand UA HOTEL ALLIANCE, as well as the owners of hotels under our management so that they can separately or jointly use personal data to provide you with services, allow an individual approach when servicing and for the purposes described above. In addition, we provide the owner with information about past and future guests of the hotel.
- Group events or meetings. If you are staying in one of the hotels united under the umbrella brand UA HOTEL ALLIANCE LCC within the framework of a group event or meeting, information received for planning the meeting or event may be provided to organizers of such meetings and events and, if necessary, to guests who arrange this event or participate therein.
- Business partners. UA HOTEL ALLIANCE LCC may cooperate with other companies in order to provide you with products, services and offers based on your stay in our hotels, and may transfer your information to our business partners, respectively. For example, we can agree upon with partners to provide you with other additional services. In order these services be provided, we must provide partners with your personal data if you are a member of loyalty programs UA HOTEL ALLIANCE, we may provide your personal data to our partners so that they give you discounts, bonuses and other benefits gained through your participation in the programs. We may also transfer your personal data, such as e-mail address, to our travel partners to help them evaluate the rules of travel or use of special tariff plans, or provide an opportunity for participation in marketing events jointly with our tourist partners. UA HOTEL ALLIANCE LCC can also cooperate with third-party organizations, such as our partner tour operators, travel agents and payment card providers to ensure delivery of advertising to our joint customers. Our partners may be able to provide you with more relevant offers based on information about your stay in our hotels. Additionally, we may allow third-party partners to recognize you when you visit a website or use application of such partner, or to identify you as one of its clients when visiting websites so that they can provide you with more relevant offers. We may transfer your hashed e-mail address to third-party companies using existing security measures so that they can link it to their hashed e-mail addresses and send you advertising materials on our behalf via the Internet and by e-mail.
- Partners arranging promotional events. UA HOTEL ALLIANCE LCC may, in cooperation with other companies, hold promotional events, drawings, lotteries, competitions or contests, as well as give prizes for lotteries and competitions held by other companies. If you participate in one of the drawings or contests, we can provide your data to our partners holding the event or to third-party sponsors.
- Hotel services. UA HOTEL ALLIANCE LCC may provide personal data to third party providers rendering services in the territory of the hotel, including spa, conference, catering and other related services.
- Service providers. UA HOTEL ALLIANCE LCC entrusts third-party companies to provide services and products on our behalf and may transfer your personal data to them, as the case may be. As a rule, our contracted service providers shall protect your personal information and may not otherwise use or transfer your personal data, unless required by law. At the same time, if service providers reveal a fraud, they may use, however not provide your personal data to reveal a fraud. UA HOTEL ALLIANCE LCC

may also involve service providers to report news and deliver you promotional and business materials on our behalf, including personalized advertising in the Internet and mobile apps in accordance with their preferences and the applicable law. We cooperate only with companies which provide an opportunity to refuse such advertising. We can also exchange information with service providers in order to allow you to develop routes by choosing websites, events, and restaurants from the lists that we have prepared for you personally based on your preferences and third-party data.

- Commercial transactions. As the business develops, UA HOTEL ALLIANCE LCC can sell or buy companies or assets, or terminate management of the hotel that is currently included in our brand portfolio. In view of this circumstance, our company may transfer, sell or surrender the information gathered, including, but not limited to, General Information (as defined in the Statement) and personal data to one or more affiliated or independent third-party companies within the framework of such commercial transactions. According to the requirements of local law, we will provide a notice of our intention to transfer personal data to third parties for this purpose and explain how you can refuse such transfer.

- Additions. Moreover, UA HOTEL ALLIANCE LCC may disclose personal data in the following cases: (I) according to the requirements of the applicable law; (II) in response to requests from government or public authorities; (III) according to the requirements of a lawsuit; (IV) for the protection of rights, privacy, security or ownership of UA HOTEL ALLIANCE LCC, website visitors, guests, employees or the public; (V) for the protection of their rights or reduction of possible loss; (VI) for the compliance with terms and conditions set forth on our websites; (VII) in case of emergency.

5. General information

When you visit and use our websites and applications, UA HOTEL ALLIANCE LCC collects other information which does not identify you personally about your use of the website, such as the directory of website pages you visit, as well as how many times you visited our websites (the “General Information”). UA HOTEL ALLIANCE LCC uses the General Information as well as data received from third-party companies to deliver you an advertising by e-mail, via the Internet (on our and other websites), and mobile apps. We may also use the General Information to allow our partners to identify you as a member of loyalty program UA HOTEL ALLIANCE LCC s when you visit such partner’s website or use his applications, or to recognize you as one of our customers when you visit websites or use our applications so that they can provide you with the most relevant offers.

UA HOTEL ALLIANCE LCC uses cookies and other technologies (such as point markers, web beacons, transparent GIFs, links in emails, JavaScript, device identifiers assigned by Google or Apple, or other similar technologies) to collect such information. You can also delete cookies from your computer or block them at any time by changing your browser settings (information on about how to delete or block cookies can be found in the browser’s Help menu).

UA HOTEL ALLIANCE LCC is not responsible for setting up your browser. You can find simple and understandable instructions on how to manage cookies for different types of web browsers at www.allaboutcookies.org.

Note for individuals residing in the European Economic Area and the United Kingdom: If you are staying in Europe, you can also customize your cookie preferences in section “Cookie Settings” by using Cookie Consent Manager, which can be found in Cookie Preferences.

UA HOTEL ALLIANCE LCC can use collected and accumulated information or anonymous personal data received from third parties to get a better idea of our users (for example, we may use aggregated information to calculate the percentage of our users who have specific telephone city code). These include demographic data, such as birth date, sex and marital status, alleged commercial interests, such as your favorite products or hobbies, as well as other information that we may receive from you or from third parties.

Since the General Information does not identify you, UA HOTEL ALLIANCE LCC may disclose this information in any legally prescribed cases. In some cases, we may combine the General Information with personal data. If the General Information is added to personal data, we will treat the resulting information as personal data in accordance with the rules of this Statement.

6. Confidential information

The term “confidential information” means information related to your race or nationality, political, religious or philosophical beliefs, membership in the trade unions, health, sexual life and orientation, genetics, criminal history, as well as any unique biometric data used for identification purposes. In some jurisdictions, mobile phone numbers, location data, and information in the identity documents are also confidential information.

UA HOTEL ALLIANCE LCC does not usually collect confidential information if it is not voluntarily provided by you or if it is not required from us in accordance with the applicable laws or regulations. We can use information about health provided by you to ensure a higher level of service that best meets your needs (for example, provide a room for people with disabilities).

7. Personal data received from children

UA HOTEL ALLIANCE LCC does not intentionally collect personal data on persons under 18. If you are a parent or guardian, do not allow your children to give personal data without your permission.

8. Access to the website from a mobile phone and services provided depending on location

UA HOTEL ALLIANCE LCC offers mobile applications that can be downloaded to a smartphone or mobile device. These applications have different functionality, enhance quality of customer service. In addition to the service provided, our applications may collect personal data and general information that will be used in accordance with this Statement. For example, to make or change a booking, you will need to provide some personal data or other information as needed. Before downloading any of our applications, we provide visitors with a link to this Statement.

If you allow our mobile apps to have an access to information about your location on your device, our mobile applications can use the Global Positioning System (GPS) and other technologies (such as wireless transmitters, known as “beacons”) of your mobile device to provide you with information and offers depending on your location. “Beacons” allow us to collect information about your location in the participating hotels by interacting with mobile devices that are within the reach. We can use such location data

to improve the service level of the hotel by sending messages and other information to your mobile device, providing navigational assistance when moving around our hotels, and sending you information and offers about products, services or activities that, in our opinion, may be of interest to you. We may transfer these data to third-party companies, including business partners and service providers, in order to provide you with information, offers and services that may be of interest to you. You can prohibit or restrict collection of location data by changing settings in the application or changing your mobile device settings.

We offer all these mobile and location-based services only to the extent permitted by the local law.

9. Links to the websites and services of the third-party companies

Our website and mobile applications may contain links to third-party websites. Please note that our company does not bear responsibility for collection, use and management of these data, as well as provision or disclosure of data and information by these third-party companies. If you provide information on the websites of third-party companies, such information is subject to privacy policy and service terms applicable on such websites. Before providing personal data on the websites, we advise you to read their privacy policy.

UA HOTEL ALLIANCE LCC can also cooperate with a limited number of Internet providers which provide free Internet access to our guests. Your use of the Internet in the hotel shall be governed by the rules of use and privacy policy of third-party Internet provider. You can read these terms and conditions using the link to the login page or visiting the website of Internet provider.

10. Personal data protection

UA HOTEL ALLIANCE LCC will take reasonable measures to: (I) protect personal data from unauthorized access, disclosure, modification or destruction; (II) monitor the accuracy and timely updating of information in appropriate cases. Our company has a reliable team of information security professionals responsible for creation, upgrading and management of security program of UA HOTEL ALLIANCE LCC.

The team of UA HOTEL ALLIANCE LCC for global information security is responsible, in particular, for monitoring of our systems for potential intrusions, reacting to potential incidents, ensuring information security in the hotels, regular analysis and updating of security controls used by our company for data protection, as well as training under the information security program of UA HOTEL ALLIANCE LCC.

In the event of security violation incidents, our company will notify the supervisory authorities and/or customers in accordance with applicable laws or regulations.

R UA HOTEL ALLIANCE LCC also demands that our partners and service providers make all endeavors to keep confidentiality of personal data they receive. When performing transactions in the Internet, we use adequate means of technical protection of personal data provided by you on our website. Unfortunately, there is no absolutely reliable security system or Internet data transmission system.

In order to protect your confidential data, do not send us payment card numbers or any other sensitive personal data by e-mail.

11. Transfer of personal data abroad

Hotels included in the portfolio of umbrella brand UA HOTEL ALLIANCE LCC are located in many countries of the world. And in every hotel you will be offered the same high level of service.

To this end, you confirm that we may provide your personal data to other members included in the portfolio of umbrella brand UA HOTEL ALLIANCE LCC, hotels under the management of UA HOTEL ALLIANCE LCC or foreign service providers. When you are staying in the hotels under the management UA HOTEL ALLIANCE outside Ukraine, this hotel transfers by using hotel management system Servio HMS and HMS Loyalty to UA HOTEL ALLIANCE LCC in Ukraine personal data related to your booking in accordance with data transfer agreements, if required by the applicable laws or regulations. The hotel may also keep a copy of your personal data, if required in accordance with the applicable laws or regulations. Although the laws on personal data protection in different countries may not be as perfect as in your country, our company will take appropriate steps to use your personal data in accordance with the rules of this Statement and the applicable law.

12. Modification of personal data and access thereto

In legally prescribed cases, UA HOTEL ALLIANCE LCC may provide you with information about available data on you and, if necessary, you may withdraw your consent to certain types of processing of your data and/or ask to modify, adjust, delete your personal data and/or suspend processing thereof. All necessary updates and modifications will be made within the time period established by the applicable law and in accordance with the applicable law. If permitted by law, an appropriate fee may be charged to cover costs associated with processing of your request. Requests can be sent by e-mail to cco@hg.reikartz.com, or to an employee of UA HOTEL ALLIANCE LCC responsible for data protection via Viber/WhatsApp: +38 067 626 1224. In order to keep confidentiality, the response to the request will be sent to e-mail address registered with us or otherwise provided.

In addition, under certain circumstances and in accordance with the applicable law, you may require that UA HOTEL ALLIANCE LCC does not provide your personal data to our business partners or that we cease to use your personal data by contacting us by e-mail or at the below postal address. We will satisfy such requests in accordance with the applicable law.

13. Personal data storage

UA HOTEL ALLIANCE LCC keeps your personal data within the time limit specified in this Statement, unless it requires a longer period of storage or unless otherwise provided by the applicable law. Within three years upon completion of your stay, we will keep your personal data collected for the purposes specified in this Statement. Other personal data shall be kept for a shorter period, if possible and if permitted by the applicable law.

We will destroy your personal data as soon as possible without an opportunity to restore or reproduce it.

Personal data on paper carriers will be destroyed in a reliable way, for example, by shredding paper documents in a shredder, burning or otherwise, and personal data stored electronically will be destroyed by using the equipment that guarantees the inability to further restore or reproduce this data.

14. Selection of marketing communications

If you have provided us with your contact information (postal address, e-mail or phone number) in accordance with your wishes and with your consent (if required), UA HOTEL ALLIANCE LCC can inform you about our products and services or invite you to the events by e-mail, via Internet advertising, social media, WeChat, WhatsApp, Viber, Telegram, by phone, text messages (including SMS and MMS), push messages, internal messages, mail, through customer support service as well as by using other means.

If you prefer not to receive electronic marketing materials from us, you can refuse at any time by using the subscription cancellation option in our e-mail. Processing the request for cancellation may take up to ten business days.

You can also report the refusal to receive text messages at the hotel reception while checking into the hotel, during your stay in the hotel and when checking out.

15. Making amendments in the Statement

From time to time this Statement may be amended. In the event of significant amendments in this Statement, the link to the updated version of the Statement will appear on the main page of our website, and if you register to use any of the products or services, you will receive a message through chosen communication channel. The date of the last update of this Statement will be indicated in this link and at the top of the document.

Any amendments in the Statement will take effect upon publication of its updated version on the website. The use of the website, any of our products and services and/or giving the consent to the updated Statement after making such amendments means your consent to the revised Statement which entered into effect.

16. Contact us

In case of any questions regarding this Statement or regarding the use of your personal data by UA HOTEL ALLIANCE LCC, please send an e-mail to cco@uaha.com or, if you want to thank or send a complaint, please contact us by e-mail to cco@uaha.com or call us by phone +38 067 626 09 37. We will answer you as soon as possible.

17. Amendments in the Statement of Privacy of UA HOTEL ALLIANCE LCC

Updated to provide more detailed information on how UA HOTEL ALLIANCE LCC collects, uses, distributes and protects personal data of our guests.

- Appendix 1 is added: "Additional provisions applicable to processing of personal data of EEA residents". Appendix 1 contains detailed information provided in accordance with Regulation (EC) 2016/679 of the European Parliament and Council of 27 April {{2016}} on the protection of individuals against processing of personal data and on the free movement of such data, commonly referred to as the "General Data Protection Regulation" (GDPR).