

# Privacy Policy

Last updated: Jun 18 2018

## 1. MAIN DEFINITIONS

Website is the privately owned website (offering services to individuals) hosted at

<https://avangard-travel.com>

Factual Address of Website Administration:

2 office lit "A" 10 Baskov Lane  
St. Petersburg Russia 191014  
"Avangard Travel Group" LLC

User is the individual or a representative for the legal entity that processed the personal data by the filled out Feedback form to the Website Administration.

The Feedback form is the special form filled by the User to process the data to the Website Administration.

## 2. General Provisions

2.1. The present private policy is the standard official document that defines the procedure for processing personal data and its security of the individuals and legal entities by the Feedback form.

2.2. The purpose of this Privacy Policy is to ensure proper protection of information about the User, including his personal data from unauthorized access and disclosure

2.3. Relations related to the collection, storage, distribution and protection of user information are governed by this Privacy Policy and the current legislation of the Russian Federation.

2.4. The current version of the Privacy Policy is a public document developed by the Site Administration and is available to any Internet User when clicking on the hypertext link "Privacy".

2.5. The Site Administration has the right to make changes to this Privacy Policy.

When making changes to the Privacy Policy, the Site Administration notifies the User about this by posting a new version of the Privacy Policy on the Site <https://avangard-travel.com>

2.6. When posting a new version of the Privacy Policy on the Site, the previous version is stored in the archive of documentation of the Site Administration.

2.7. By using the Feedback Form, the User agrees to the terms of this Privacy Policy.

2.8. The Site Administration does not verify the accuracy of the information received (collected) about the User.

### **3. TERMS AND PURPOSES OF COLLECTING AND PROCESSING USERS ' PERSONAL DATA**

3.1. The User's personal data, such as: first name, last name, patronymic, e-mail, phone, etc., are processed by the User to the Site Administration with the User's consent.

3.2. The transfer of personal data by the User to the Site Administration through the Feedback Form means the User's consent to the transfer of his personal data.

3.3. The Site Administration processes information about the User, including his / her personal data, such as: first name, last name, patronymic, e-mail, phone, etc., as well as additional information about the User provided by the User at own will in order to fulfill obligations to the Site User.

3.4. The processing of personal data is based on the following principles:

a) Lawfulness of the object and the manner of processing the personal data;

b) That the purpose of processing personal data shall be consistent with the objectives predetermined and stated in the collection of personal data;

b) Conformity of the volume and nature of personal data processed with the methods of processing personal data and with the purposes of processing personal data;

c) Under the case of impossibility to merge databases, containing personal data created for incompatible purposes.

3.5. The Site administration performs the processing of the User's personal data with the consent of the User in order to provide services/sales of goods offered on the Site.

### **4. PERSONAL DATA STORAGE AND USE**

The User's personal data shall be stored exclusively in electronic media and shall be used strictly for the purpose specified in Clause 3 of this Privacy Policy

### **5. PERSONAL DATA PROCESSING**

5.1. The personal data of the User shall not be delivered to any Third Party except for cases expressly provided herein and specified in the Dispatch Consent

5.2. Any Provision of the User personal data at the request of public authorities or regional state administration shall be implemented in accordance with the procedure established by the legislation of the Russian Federation.

### **6. STORAGE TIME AND PERSONAL DATA DELETION**

6.1. The User's personal data shall be stored in the electronic medium of the Site indefinitely.

6.2. The personal data of the User shall be deleted by the User's wish. In this case, either the application is required, or at the initiative of the Site administration without further notifications

### **7. THE USERS RIGHTS AND DUTIES**

Upon request, Users are entitled to receive from the Site Administration the information concerning the processing of their personal data.

### **8. PERSONAL DATA PROTECTION**

The Site Administrator shall take technical, organizational and legal measures to protect the User's personal data from improper or accidental access: its disclosure, modification, blocking, copying, distribution, as well as other unlawful acts.

## 9. USERS REQUEST

9.1. The User has the right to send the Site Administration his/her requests, regarding the use / disclosure of his / her personal data, according to Clause 3 of this Privacy Policy and in written form to the address specified in Clause 1

9.2. The User's request shall contain the following information:

For an individual:

- the ID number of the User or his/her representative;
- date of issue and the issue state institution for the ID;
- date of registration via the Feedback Form;
- the application conducted in free form

For the legal entity:

- the application made in free form on the letterhead;
- date of registration via the Feedback Form;
- the application shall be signed by an authorized person with the attached docs confirming the authority of the person.

9.3. The Site Administration undertakes to consider and send a response to the User's application within 30 days from the date of the request has been received.

9.4. All correspondence received by the Administration from the User (requests in written/electronic form) refers to restricted access information and is not subject to disclosure without the User's written consent. Personal data and other information about the User who sent the application shall not be used without the User's special consent, except for responding to the subject of the request received or in cases the Law demands.