# PRIVACY POLICY

# 1.General provisions

- 1.1. "LendoChat" (hereinafter referred to as the Operator) sets as its most important goal and condition for the implementation of its activities the observance of the rights and freedoms of a person and a citizen in the processing of his personal data, including the protection of the rights to privacy, personal and family secrets.
- 1.2. This Operator's policy regarding the processing of personal data (hereinafter referred to as the Policy) applies to all information that the Operator can receive about visitors or users to http://lendo.chat and its respective products.
- 1.3. «LendoChat» respects the privacy of our users ("user" or "you"). This Privacy Policy explains how we collect, use, disclose, and safeguard your information when you use our product (hereinafter referred to as LendoChat). IF YOU DO NOT AGREE WITH THE TERMS OF THIS PRIVACY POLICY, PLEASE DO NOT ACCESS THE APPLICATION.

#### 2.Basic terms

- 2.1. Automated processing of personal data processing of personal data using computer equipment;
- 2.2. Blocking of personal data temporary suspension of the processing of personal data (unless it is necessary to process personal data);
- 2.3. LendoChat Web-based messaging platform between guests and hotel staff using machine learning and cloud service algorithms, the network address is http://lendo.chat;
- 2.4. Personal data information system a set of personal data contained in databases, and information technologies and technical means ensuring their processing;
- 2.5. De-personalization of personal data actions, as a result of which it is impossible to determine without the use of additional information whether the personal data belong to a specific User or another subject of personal data;
- 2.6. Processing of personal data any action (operation) or set of actions (operations) performed with the use of automation tools or without the use of such tools with personal data, including the collection, recording, systematization, accumulation, storage, refinement (update, change), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data;
- 2.7. Operator a state body, municipal body, legal or individual, independently or jointly with other persons organizing and (or) processing personal data, as well as determining the purposes of personal data processing, the composition of personal data to be processed, actions (operations) committed with personal data;
- 2.8. Personal data any information relating directly or indirectly to a specific or definable User of the website http://lendo.chat or LendoChat product;
- 2.9. User any visitor of the web site http://lendo.chat or user of relevant products;

- 2.10. Provision of personal data actions aimed at disclosing personal data to a specific person or a specific number of persons;
- 2.11. Dissemination of personal data any actions aimed at disclosing personal data to an indefinite number of persons (transfer of personal data) or to become familiar with personal data of an unlimited number of persons, including public disclosure of personal data in the media, placement in information and telecommunication networks or providing access to personal data in some other way;
- 2.12. Trans-border transfer of personal data transfer of personal data to the territory of a foreign state to the authority of a foreign state, foreign individual or foreign legal entity;
- 2.13. Destruction of personal data any actions as a result of which personal data are destroyed irrevocably with the impossibility of further restoring the content of personal data in the personal data information system and / or the result of which the material carriers of personal data are destroyed.

# 3. The operator can process the following personal data of the User that he/she voluntarily gives

- 1. Last name, first name;
- 2. Email address;
- 3. Phone numbers;
- 4. Also there is a collection and processing of anonymous data about visitors and users of LendoChat (including cookies) using Internet statistics services (Yandex Metrika and Google Analytics and others).
- 5. The above data is further referred to under the Policy by the general concept of Personal Data.

# 4. Purpose of processing personal data

- 4.1. The purpose of processing the User's personal data is to provide the User with access to the services, information and / or materials of LendoChat.
- 4.2. The Operator also can send notifications to the User about new products and services, special offers and various events. If User wishes to opt-out from receiving these types of communications, he/she can always refuse to receive informational messages by sending an e-mail to the Operator on info@lendohotel.com with the note "Refusal to notify about new products and services and special offers".
- 4.3. We may use cookies, web beacons, tracking pixels, and other tracking technologies on the Application to help customize the Application and improve your experience.

# 5. Legal grounds for the processing of personal data

- 5.1. The Operator processes the personal data of the User only if they are filled in and / or sent by the User independently through special forms located on the site http://lendo.chat or its application. By filling out the appropriate forms and / or sending your personal data to the Operator, the User agrees with this Policy.
- 5.2. The operator processes the de-identified data about the User, if it is allowed in the settings of the

# 6. The order of collection, storage, transmission and other types of personal data processing

Operator uses administrative, technical, and physical security measures to help protect your personal information and fully implement the requirements of the current legislation of personal data protection.

- 6.1. The operator ensures the safety of personal data and takes all possible measures to prevent access to personal data of unauthorized persons.
- 6.2. The personal data of the User will never, under any circumstances, be passed to the third parties, except in cases related to the execution of current legislation. 6.3. If we believe the release of information about you is necessary to respond to legal process, to investigate or remedy potential violations of our policies, or to protect the rights, property, and safety of others, we may share your information as permitted or required by any applicable

law, rule, or regulation. This includes exchanging information with other entities for fraud protection and credit risk reduction.

- 6.4. In case of detection of inaccuracies in personal data, the User can update them independently by sending a notification to the Operator to the Operator's e-mail address info@lendohotel.com with the note "Updating personal data".
- 6.5. The term for processing personal data is unlimited. The user may at any time withdraw his consent to the processing of personal data by sending a notification to the Operator via e-mail to the Operator's email address info@lendohotel.com marked "Withdrawal of consent to the processing of personal data".

# 7. Trans-border transfer of personal data

7.1. The operator is obliged to ensure prior to the commencement of the trans-border transfer of personal data that the foreign state, to the territory of which it is planned to transfer personal data, ensures reliable protection of the rights of personal data subjects. 7.2. Trans-border transfer of personal data on the territory of foreign states that do not meet the above requirements can only be carried out if there is a written consent of the subject of personal data on the cross-border transfer of his personal data and / or performance of a contract to which the subject of personal data is a party.

# 8. Final provisions

- 8.1. The User may receive any clarifications on issues of interest relating to the processing of his personal data by contacting the Operator via email info@lendohotel.com. 8.2. This document will contain any changes in the personal data processing policy of the Operator. The policy is valid indefinitely until replaced with a new version. We reserve the right to make changes to this Privacy Policy at any time and for any reason.
- 8.3. The current version of the Policy along with updates is available on the Internet at http://lendo.chat.

- 8.4. Changes to this Privacy Policy may be made without the consent of the User.
- 8.5. The new Privacy Policy come into force from the moment it is posted on the Website http://lendo.chat, unless otherwise provided by the new edition of the Privacy Policy.

#### 9. Contact us

If you have questions or comments about this Privacy Policy, please contact us at: info@lendohotel.com.

# **Cookies Policy**

This Cookie Policy explains what cookies are and how we use them. You should read this policy to understand what cookies are, how we use them, the types of cookies we use, the information we collect using cookies and how that information is used and how to control the cookie preferences.

#### 1. What are cookies?

LendoHotel LLC is responsible for the website <a href="https://guest.lendohotel.com/">https://guest.lendohotel.com/</a>

and uses cookies and/or other files of similar functionality (hereinafter "Cookies").

Cookies are small data files which are sent to the user's computer, mobile phone or other access device when you visit a website and that allow to obtain information relating to your browsing or a code that allows you to uniquely identify the user.

If you have any queries about the way we use your personal information or cookies, please contact our Data Protection Officer at info@lendohotel.com

If you wish to manage your cookies, please follow the instructions in the "How to manage cookies" section below.

#### 2. How do we use cookies?

As most of the online services, our website uses cookies first-party and third-party cookies for a number of purposes. The first-party cookies are mostly necessary for the website to function the right way, and they do not collect any of your personally identifiable data.

The third-party cookies used on our websites are used mainly for understanding how the website performs, how you interact with our website, keeping our services secure, providing advertisements that are relevant to you, and all in all providing you with a better and improved user experience and help speed up your future interactions with our website.

#### 3. When do we collect the information?

We collect information from you when you fill the authorization form on our website or enter information on our website.

# 4. Types of cookies and purpose of use

This website uses session Cookies and/or persistent Cookies which, in turn, may be Cookies of its own and/or third parties.

#### **Strictly Necessary Cookies**

These cookies are necessary for the website to function and cannot be switched off in our systems. They are usually only set in response to actions made by you which amount to a request for services, such as setting your privacy preferences, logging in or filling in forms. You can set your browser to block or alert you about these cookies, but some parts of the site will not then work. These cookies do not store any personally identifiable information.

**Session Cookies** are cookies designed to collect and store data while the user accesses a website. Are often used to store information that is only interested in preserving for the service requested by the user on a single occasion.

**Persistent Cookies** are a type of cookies in which data remains stored in the terminal and that can be accessed and treated during a period defined by the responsible of the cookie, and can range from a few minutes to several years.

**First-party Cookies:** Those created or managed by the responsible of the website <a href="https://guest.lendohotel.com/">https://guest.lendohotel.com/</a>. The website <a href="https://guest.lendohotel.com/">https://guest.lendohotel.com/</a> uses Cookies own the following purposes:

- **Techniques:** allow the user to navigate the use of the different options or services it exist as, for example, control traffic and data communication, identify the session, access parts of restricted access, use elements of safety during navigation, store content.
- **Analytical Cookies:** These cookies compile anonymous information about the browsing and patterns of behaviour of the user in a standardized way.

They allow the monitoring and analysis of the behaviour of users on the Website. The information collected via these analytical cookies is used to construct browsing profiles of the users for the purpose of improving our service.

The primary purposes of this type of cookie are:

- Allowing the anonymous identification of users and, thus, the tabulation of the approximate number of visitors.
- Identifying anonymously the most visited contents and, thus, what is most appealing to users.
- Knowing if the entering user is new or is making a repeat visit.

Below, both the third parties that can configure and access Cookies on your computer are detailed, as well as the purposes with which the information they store is used:

Name	Purpose	Own or third- party	Duration
<hotel_id>_self</hotel_id>	Store room number and guest name.	first-party	2 weeks
<hotel_id>_sid</hotel_id>	Store session identifier which is used to match a guest with guest's chat history.	first-party	2 weeks
_ga	Registers a unique identifier that is used to generate statistical data about how you use the visitor to the web site	third-party (Google Analyitcs)	two years
_gat	Used by Google Analytics to control the rate of requests	third-party (Google Analyitcs)	1 day
_gid	Google Analytics. Registers a unique identifier that is used to generate statistical data about how you use the visitor to the web site	third-party (Google Analyitcs)	1 day
utma	Used to distinguish users and sessions in Google Analytics.	third-party (Google Analyitcs)	2 years from set/update
utmb	Used to determine new sessions/visits.	third-party (Google Analyitcs)	30 mins from set/update
utmz	Stores the traffic source or campaign that explains how the user reached the website.	third-party (Google Analyitcs)	6 months from set/update

_ym_metrika_enabled	Checks whether other Yandex.Metrica cookies are installed correctly	third-party (Yandex Metrika)	60 minutes
_ym_isad	Determines whether a user has ad blockers	third-party (Yandex Metrika)	2 days
_ym_uid	Used for identifying site users	third-party (Yandex Metrika)	1 year
_ym_d	Saves the date of the user's first site session	third-party (Yandex Metrika)	1 year

# 5. Third-party links

Occasionally, at our discretion, we may include or offer third-party products or services on our website. These third-party sites have separate and independent privacy policies and cookie policy. We therefore have no responsibility or liability for the content and activities of these linked sites. Nonetheless, we seek to protect the integrity of our site and welcome any feedback about these sites.

# 6. How to manage the cookies?

The majority of web browsers enable you to manage, at any time, the user's preferences about the use of Cookies. The user may adjust your browser to reject Cookies or delete certain Cookies at their discretion.

Find out how to manage cookies on popular browsers:

- · Google Chrome
- Microsoft Edge
- Mozilla Firefox
- Microsoft Internet Explorer
- · <u>Opera</u>
- · Apple Safari

The user can revoke your consent to the use of Cookies in your browser via the instructions above or through the installation of a system of denial, ("opt-out") in your web browser.

To opt out of being tracked by Google Analytics across all websites, visit <a href="http://tools.google.com/dlpage/gaoptout">http://tools.google.com/dlpage/gaoptout</a>.

The user must take into account that some features of the contents of the Website <a href="https://guest.lendohotel.com/">https://guest.lendohotel.com/</a> are only available if you allow the installation of Cookies in your browser. If you choose not to accept or block certain Cookies (depending on their purpose), this may affect, totally or partially, the normal operation of this website which may prevent access to some services of the same.

If you want more information about how we use Cookies, you can send us an e-mail to info@lendohotel.com.