

VISATOHOME PRIVACY POLICY

BACKGROUND:

This Policy applies as between you, the User of this Website and App, and Russian National Tourist Office Limited, the owner and provider of this Website. This Policy applies to our use of any and all Data collected by us in relation to your use of the Website.

1. Definitions and Interpretation

In this Policy, the following terms shall have the following meanings:

“Data”	means collectively all information that you submit to VISATOHOME via the Website. This definition shall, where applicable, incorporate the definitions provided in the Data Protection Act 1998;
“Cookie”	means a small text file placed on your computer by this Website when you visit certain parts of the Website and/or when you use certain features of the Website. Details of the cookies used by this Website are set out in Clause 12;
“VISATOHOME”	means AMARANTA TECHNOLOGY LIMITED (28 Nicodemou Mylona, P.C. 3095, Limassol, Cyprus);
“UK and EU Cookie Law”	means the Privacy and Electronic Communications (EC Directive) Regulations 2003 as amended by the Privacy and Electronic Communications (EC Directive) (Amendment) Regulations 2011;
“User / Users”	means any third party who accesses, browses, crawls, scrapes, or in any way uses the Website and is not employed by VISATOHOME and acting in the course of their employment; and
“Website”	means the website that you are currently using and any sub-domains of this site including all/any mobile applications that link to or reference these Terms unless expressly excluded by their own terms and conditions.

2. Scope of this Policy

This Policy applies only to the actions of VISATOHOME and Users with respect to the Website. It does not extend to any websites that can be accessed from this Website including, but not limited to, any links we may provide to social media websites.

VISATOHOME needs to gather and receive specific information about its Users and Visa Applicants in order to provide the relevant services. When the Applicant and the User supply VISATOHOME with personal data, VISATOHOME recognises that it has certain legal obligations in the way that it deals with this personal data. VISATOHOME complies with all relevant legal requirements for handling clients' personal data.

3. **Data Collected**

Without limitation, any data, including but not limited to the following Data, may be collected by the Website from time to time: Name; date of birth; gender; job title; profession; contact information such as email addresses and telephone numbers; demographic information such as post code, preferences and interests; financial information such as credit/debit card numbers; IP address (automatically collected); web browser type and version (automatically collected); operating system (automatically collected); a list of URLs starting with a referring site, your activity on this Website, and the site you exit to (automatically collected).

Depending on the country to which the application is made, the list of documentation and personal information to be provided by the Applicant will vary.

The processing of the information will include:

- Collection of data
- Storage
- Updating
- Alteration
- Transmission
- Destruction

When the User or/and the Applicant has familiarised himself/herself with visa application requirements, he/she compiles a list of necessary documentation and provides relevant information together with the documentation to the Operator. This is done through providing information directly via the app or the website and through sending the relevant documentation to the Operator. The Operator then collects all this information.

If the information provided by the Applicant changes and/or is no longer relevant, the Operator can update and/or alter this information. The Applicant has to consent to these changes.

As soon as the information provided by the Applicant corresponds to the requirements for visa application, the Operator transmits the information to the Consulate.

The Applicant can demand his/her personal information to be destroyed at any point. This is done through writing a formal written request to VISATOHOME. The Operator ceases to use any personal data specified by the user in the letter within 3 working days. A letter confirming this will be sent by VISATOHOME within the following 10 working days.

There is an option whereby the User can choose to have his personal information re-used for future visa applications via VISATOHOME. In this case, VISATOHOME stores the relevant visa application information on its servers in order to facilitate any future applications. As previously stated, the User can demand any of their information to be deleted.

Certain services, including those that indicate the availability of our services in your region, delivery times, prices etc. will use location data. The User can choose not to use automatic location services. In this case, the location data can be entered manually.

In the App, you can turn this function off at any time by turning off the location services settings for VISATOHOME App on your mobile device. If you use these services, you consent to our and our partners' and licensees' transmission, collection,

maintenance, processing and use of your location data and queries to provide and improve our location services. You may withdraw this consent at any time by turning off the location services settings on your device.

Our location services use API Google location platform, which is governed by the terms and conditions in <https://www.google.com/accounts/TOS>

The platform for location is activated upon users' permission in the app, and as soon as the user first accesses the page on the website.

Our Use of Data

- 3.1 Any personal Data you submit will be retained by VISATOHOME for the purposes of providing you with the services. Subject to your right to request that your data be deleted in accordance with the provisions of Clause 3 above, VISATOHOME reserves the right to retain such personal data for ease of reference in respect of any future applications you may make. The data provided by the Applicant is processed and transmitted by the Operator VISATOHOME.
- 3.2 Unless we are obliged or permitted by law to do so, and subject to Clause 5, your Data will not be disclosed to third parties. This does not include our affiliates and/or other companies within our group.
- 3.3 All personal Data is stored securely in accordance with the principles of the Data Protection Act 1998. For more details on security, see Clause 11 below.
- 3.4 Any or all of the above Data may be required by us from time to time in order to provide you with the best possible service and experience when using our Website. Specifically, Data may be used by us for the following reasons:
 - 3.4.1 internal record keeping;
 - 3.4.2 improvement of our products/services;
 - 3.4.3 transmission by email of promotional materials that may be of interest to you;
 - 3.4.4 contact for market research purposes which may be done using email, telephone, fax or mail. Such information may be used to customise or update the Website.

4. **Third Party Websites and Services**

- 4.1 VISATOHOME may, from time to time, employ the services of other parties for dealing with matters that may include, but are not limited to, payment processing, delivery of purchased items, search engine facilities, advertising and marketing. The providers of such services may have access to certain personal Data provided by Users of this Website.
- 4.2 Any Data used by such parties is used only to the extent required by them to perform the services that VISATOHOME requests. Any use for other purposes is strictly prohibited. Furthermore, any Data that is processed by third parties shall be processed within the terms of this Policy and in accordance with the Data Protection Act 1998.

5. **Links to Other Websites**

This Website may, from time to time, provide links to other websites. VISATOHOME has no control over such websites and is in no way responsible for the content thereof. This Policy does not extend to your use of such websites. Users are advised to read the privacy policy or statement of other websites prior to using them.

6. **Changes of Business Ownership and Control**

6.1 VISATOHOME may, from time to time, expand or reduce our business, and this may involve the sale and/or the transfer of control of all or part of VISATOHOME. Data provided by Users will, where it is relevant to any part of our business so transferred, be transferred along with that part, and the new owner or newly controlling party will, under the terms of this Policy, be permitted to use the Data for the purposes for which it was originally supplied to us.

6.2 In the event that any Data submitted by Users is to be transferred in such a manner, you may not be contacted in advance and informed of the changes.

7. **Controlling Use of Your Data**

7.1 Where you are required to submit Data, you will be given options to restrict our use of that Data. This may include the following:

7.1.1 use of Data for direct marketing purposes; and

7.1.2 sharing Data with third parties.

8. **Your Right to Withhold Information**

8.1 You may access the Website, and certain areas of it, without providing any Data at all. However, to use all features and functions available on the Website you may be required to submit certain Data.

8.2 You may restrict your internet browser's use of Cookies. For more information, see Clause 12.

9. **Accessing your own Data**

You have the right to ask for a copy of any of your personal Data held by VISATOHOME (where such data is held) on payment of a small fee which will not exceed £10.00 (ten Pounds).

10. **Security**

10.1 Data security is of great importance to VISATOHOME, and to protect your Data, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure Data collected via this Website.

11. **Cookies**

11.1 This Website may place and access certain first party Cookies on your

computer. First party cookies are those placed directly by VISATOHOME via this Website and are used only by VISATOHOME. VISATOHOME uses Cookies to improve your experience of using the Website and to improve our range of services. VISATOHOME has carefully chosen these Cookies and has taken steps to ensure that your privacy is protected and respected at all times.

- 11.2 By using this Website you may receive certain third party Cookies on your computer. Third party cookies are those placed by websites and/or parties other than VISATOHOME. Third party cookies may be used on this Website for the provision of advertising and/or other services. A number of the services we use to add value and convenience to your experience of the Website may set cookies on your browser on behalf of VISATOHOME. These services may fall into two broad groups: Web Analytics and Social Media.
- 11.3 All Cookies used by this Website are used in accordance with current UK and EU Cookie Law. Generally, our cookies may perform up to four different functions as follows:
- a) Performance cookies: These are used to analyse how Users use our Website and to monitor Website performance. These cookies allow VISATOHOME to provide a quality experience to its Users by customising the services offered and identifying and fixing any issues that may arise. Performance cookies may, for example, be used to keep track of which pages of our Website are most popular and which method of linking between pages is most effective. They can be used to determine why some pages may be receiving error messages. Performance cookies might also be used to highlight articles or site services that VISATOHOME believes will be of interest to Users based on the usage of the website.
 - b) Functionality Cookies: These allow VISATOHOME to remember a User's preferences in order, for example, to save the trouble of typing in usernames every time the Website is accessed, and to recall the User's customisation preferences.
 - c) Advertising cookies: Advertisers may use cookies to serve the User with advertisements which VISATOHOME considers to be relevant to the User's interests.
 - d) Essential Cookies: Some cookies are essential for the operation of the website. For example, some cookies allow VISATOHOME to identify subscribers and ensure they can access the subscription only pages. Current UK and EU Cookie Law deems these Cookies to be "strictly necessary". Your consent will not be sought to place these Cookies. You may still block these cookies by changing your internet browser's settings as detailed below. However, if a subscriber opts to disable these cookies, the User will not be able to access all of the content that a subscription entitles them to.
- 11.4 Before Cookies are placed on your computer, subject to sub-Clause 12.3(d) above and/or sub-Clause 12.6 below, you will be presented with a pop-up or message bar or similar prompt requesting your consent to set those Cookies. By giving your consent to the placing of Cookies you are enabling VISATOHOME to provide the best possible experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however, certain features of the Website may not function fully or as intended.
- 11.5 This Website uses website analytic services which refers to a set of tools used to collect and analyse usage statistics, enabling VISATOHOME to better

understand how Users use the Website. This, in turn, enables us to improve the Website and the services offered through it. You do not have to allow us to use these Cookies, as detailed below. However, whilst our use of them does not pose any risk to your privacy or your safe use of the Website, it does enable us to continually improve our services.

- 11.6 The analytics services used by this Website use Cookies to gather the required information. Certain of these Cookies may be placed immediately when you decide to visit the Website and it may not be possible to obtain your prior consent. You may remove these Cookies and prevent future use of them by following the steps set out below.
- 11.7 You can choose to enable or disable Cookies in your Internet browser. Most Internet browsers also enable you to choose whether you wish to disable all cookies or only third party cookies. By default, most Internet browsers accept Cookies, but this can be changed. For further details, please consult the help menu in your Internet browser. Note, however, that if a User disables essential cookies, the User may not be able to access all of the content available or such content that the User may otherwise be entitled to access by virtue of an account or subscription.
- 11.8 You can choose to delete Cookies at any time. However, you may lose any information that enables you to access the Website more quickly and efficiently including, but not limited to, personalisation settings.
- 11.9 It is recommended that you ensure that your Internet browser is up-to-date and that you consult the help and guidance provided by the developer of your Internet browser if you are unsure about adjusting your privacy settings.

12. **Changes to this Policy**

VISATOHOME reserves the right to change this Policy as we may deem necessary from time to time or as may be required by law. Any changes will be posted on the Website, and you are deemed to have accepted the terms of the Policy on your first use of the Website following the alterations.

13. **Payment protection**

VISATOHOME uses the SSL secure connection, so any of the data that your computer transmits to us, including payment history, is protected in accordance with PCI DSS (Payment Card Industry Data Security Standard). We never store any information about your payment details on our servers.

When the User gets to the section for the payment, the user pays for:

- The services provided by VISATOHOME (described in detail above) (including VAT)
- The delivery (including VAT)
- The Visa application (this fee is collected by the Consulate in order to process your visa)

14. **Transferring the data outside the EEA**

VISATOHOME complies with the US-EU Safe Harbor Framework as set forth by the US Department of Commerce regarding the collection, use, and retention of personal information from European Union member countries and Switzerland. VISATOHOME

has certified that it adheres to the Safe Harbor Privacy Principles of notice, choice, onward transfer, security, data integrity, access, and enforcement.

14. **Terms & Conditions**

Use of our Website is governed by our Terms & Conditions <http://visatohome.co.uk/termsconditions> and this Privacy Policy **has been incorporated into the said Terms & Conditions by reference. This Privacy Policy should be read in conjunction with the said Terms and Conditions.**