

**PRIVACY POLICY AND PROCEDURE
FOR PROCESSING PERSONAL DATA
OF THE LIMITED LIABILITY COMPANY “EDEM HOTELS GROUP”**
(hereinafter – the Policy)

*in the version
dated 02.06.2026*

This Privacy Policy and Procedure for Processing Personal Data of LLC “EDEM HOTELS GROUP”, USREOU code 42500541, address: 03065, Kyiv, Solomianskyi District, 51/16 Vaclav Havel Boulevard, Ukraine (hereinafter – the **Provider**), has been developed in accordance with the Law of Ukraine “On Personal Data Protection” (hereinafter – **the Law**) and other applicable legislation of Ukraine in the field of personal data processing and ensuring information confidentiality.

This Policy enters into force on November 1, 2025, is posted on the Website and remains valid until a new version of the Policy takes effect.

The Policy contains information about the procedure for processing personal data, the types of personal data processed, the purpose and legal grounds for processing personal data, categories of data subjects, the Provider’s interaction with third parties, conditions of access to personal data, contact information for the Provider’s customers regarding access, rectification or erasure of their personal data and for addressing any questions that may arise for the data subject concerning the protection of their personal data, as well as requirements for ensuring confidentiality of information about pre-contractual / contractual relations of the Provider with customers and any third parties.

Processing of personal data by the Provider is carried out exclusively for the purpose specified in this Policy and with the Consent of the Customer.

Definitions

Personal data database — a named set of structured personal data in electronic form and/or in the form of personal data card files;

Controller of the personal data database — a natural or legal person to whom the right to process these data is granted by law or by the consent of the data subject, who determines the purpose of processing personal data in this database, establishes the composition of such data and the procedures for their processing;

Consent — voluntary expression of will by an individual (provided he/she is properly informed) to grant permission for the processing of his/her personal data for the stated purpose, expressed in written form or in a form that allows concluding that consent has been given;

Processing of personal data — any action (operation) or set of actions, including collection, recording, systematization, accumulation, storage, updating (modification, rectification), retrieval, use, transfer (dissemination, access granting), depersonalization, blocking, deletion, destruction, etc. of personal data;

Personal data — information or set of information about an identified or identifiable natural person;

Processor of the personal data database — a natural or legal person to whom the right to process these data is granted by the controller of the database or by law. A person who is instructed by the controller and/or processor to perform technical work on the database without access to the content of personal data is not considered a processor;

Website — software of the Provider or a set of software tools engaged by the Provider that allow it to receive, process and service orders for remote purchase of goods/services, provide Customers with information about goods/services, etc.;

Data subject — a natural person whose personal data are processed;

Third party — any person except the data subject, the controller or processor of personal data, and the Commissioner of the Verkhovna Rada of Ukraine for Human Rights, to whom personal data are transferred by the controller or processor.

Personal data constituting special risk — personal data concerning racial, ethnic or national origin; political, religious or philosophical beliefs; membership in political parties and/or organizations, trade unions, religious or philosophical public organizations; health condition; sex life; biometric data; genetic data; administrative or criminal liability; application of pre-trial investigation measures to the person; application of measures provided for by the Law of Ukraine “On Operative-Search Activities”; commission of

various types of violence against the person; location and/or movement paths of the person.

Categories of personal data subjects

The Controller and Processor of personal data is the Provider. The place of personal data processing is the Provider's location: Kyiv region, Obukhiv district, Kozyn village, Starokyivska Street, 22. The processor of personal data may also be a natural or legal person to whom the right to process personal data on behalf of the Provider is granted by the Provider or by law.

The data subject is a natural person who is in pre-contractual / contractual relations with the Provider regarding the purchase of goods/services from the Provider (hereinafter – **the Customer**).

The Customer consents that during processing the Provider may transfer his/her personal data to third parties if this is necessary to achieve the purposes of processing and provided that such third parties ensure confidentiality and security of the Customer's personal data.

Purpose and legal grounds for processing personal data

The purpose of processing Customers' personal data is to ensure civil-law, tax and accounting relations, in particular to ensure relations in the economic sphere, provision/receipt and settlement for purchased goods/services, sending informational and marketing mailings (news, promotions, information about promotions, promo codes and discounts, personalized recommendations, personalized discounts and offers) containing information about goods and/or services, advertising and commercial offers regarding such goods and/or services, etc.

In case of change of the defined purpose of personal data processing to a new purpose incompatible with the previous one, for further processing the Provider, as Controller and Processor of personal data, must obtain the Customer's consent to process his/her data in accordance with the changed purpose.

The legal ground for processing the Customer's personal data is the unconditional, indefinite and irrevocable Consent of the Customer, which is given by checking the box granting permission to process personal data in accordance with the purpose stated in this Policy / by using the Website.

By giving Consent to the processing of his/her personal data, the Customer consents to the inclusion of his/her personal data in the personal data database controlled by the Provider. The Customer confirms that he/she has read and agrees with the terms of this Policy, as well as with the rights granted to him/her as a data subject under Article 8 of the Law of Ukraine "On Personal Data Protection", namely:

1. to know the sources of collection, location of his/her personal data, purpose of their processing, location or place of residence (stay) of the controller or processor of personal data or to give a corresponding instruction to obtain this information to authorized persons, except in cases established by law;
2. to receive information about the conditions of access to personal data, including information about third parties to whom his/her personal data are transferred;
3. to access his/her personal data;
4. to receive, no later than thirty calendar days from the date of receipt of the request (except in cases provided by law), a response as to whether his/her personal data are being processed, as well as the content of such personal data;
5. to submit a reasoned request to the controller of personal data objecting to the processing of his/her personal data;
6. to submit a reasoned request for rectification or erasure of his/her personal data by any controller or processor if such data are processed unlawfully or are inaccurate;
7. to protect his/her personal data from unlawful processing and accidental loss, destruction, damage due to intentional concealment, non-provision or untimely provision, as well as protection from provision of inaccurate information or information that discredits honor, dignity and business reputation of an individual;
8. to lodge complaints regarding the processing of his/her personal data with the Commissioner or with a court;
9. to apply legal remedies in case of violation of personal data protection legislation;
10. to include reservations restricting the right to process his/her personal data when giving consent;
11. to withdraw consent to the processing of personal data;
12. to know the mechanism of automated processing of personal data;
13. to protection against an automated decision that has legal consequences for him/her.

The Customer gives his/her consent to the Provider for cross-border transfer of his/her personal data and confirms that recipients of such personal data during cross-border transfer may be located in other countries.

The Provider does not process personal data constituting special risk.

Composition of personal data

The composition of the Customer's personal data includes: surname, first name and (if available) patronymic; mobile phone number; email address; other information that the Provider receives in connection with entering into contractual and/or pre-contractual relations with the Customer, including during the term of such relations.

Primary sources of information about the Customer are: documents issued in his/her name; documents signed by him/her; information that the Customer provides about himself/herself, including on the Website.

The Customer undertakes to provide the Provider with complete, accurate, reliable and up-to-date information, data and personal data, and bears full responsibility for this. The Customer bears liability (including criminal liability) for using information, data and personal data of third parties.

Procedure for processing personal data

The Provider processes personal data using automated means as well as without using such means. To process personal data, the Provider has the right to engage third parties, for whose actions the Provider bears responsibility as for its own.

The storage period of personal data is the entire period of contractual relations between the Customer and the Provider, as well as 1 year after termination of contractual relations with the Customer.

The Provider ensures secure storage of personal data using various methods and levels of protection aimed at preventing unauthorized access to personal data. The Provider's information security system includes: installation of technical security and protection means; setting passwords for all technical and software means; selection and installation of antivirus programs; other means of personal data protection.

Erasure/destruction of Customers' personal data is carried out upon a reasoned written request of the Customer, upon expiry of the storage period of personal data, and in other cases provided by the applicable legislation of Ukraine. Rectification of personal data is carried out immediately upon detection of information about the Customer that does not correspond to reality.

The Customer consents that, during processing, the Provider has the right to transfer his/her Personal Data to Third Parties if this is necessary to achieve the purposes of processing and provided that such Third Parties ensure the confidentiality and security of the Customer's Personal Data. The transfer of Personal Data in accordance with this paragraph does not require separate consents or notifications from the Customer and occurs without notifying the Customer or obtaining his/her consent for such transfer.

Access to Personal Data is granted to persons performing processing exclusively if the said person has undertaken obligations to ensure compliance with the requirements of the Law and is capable of fulfilling them. Access to the Customer's Personal Data is granted in response to a request for access to personal data, which must specify:

- surname, first name and (if applicable) patronymic, place of residence (place of stay), and details of the identity document of the natural person submitting the request (for an individual applicant);
- name, location, USREOU code of the legal entity, position, surname, first name and patronymic of the person certifying the request; confirmation that the content of the request corresponds to the powers of the legal entity (for a legal entity applicant);
- surname, first name and patronymic, as well as other information that allows identification of the Customer in respect of whom the request is made;
- list of Personal Data requested;
- purpose and/or legal grounds for the request.

The response period to the request is thirty calendar days from the date of its receipt, unless otherwise provided by the applicable legislation of Ukraine.

Confidentiality Provisions

The Customer and the Provider have agreed that any information, in written, oral, electronic, visual, graphic or any other form, provided before, during or after the pre-contractual/contractual relations between the Customer and the Provider is confidential, except for information that is generally known and/or publicly

available or lawfully obtained from a third party without breach of the terms of this Policy.

Unlawful use of confidential information includes, but is not limited to, use of confidential information for personal purposes unrelated to the cooperation of the parties, direct or indirect provision or disclosure of confidential information to third parties without the permission of the owner of such information.

The Customer and the Provider are obliged to keep confidential information secret, not to disclose or divulge it (orally and/or in written form, including in electronic form), to take all necessary measures to ensure the protection of confidential information and not to use it for unlawful purposes.

By using the Website, the Customer gives his/her consent to the use of Cookie files (hereinafter – Cookies). Cookies are small text files stored on the Customer's device used to access the Website. Cookies are stored in a designated folder. Cookies allow previously entered data in the Website's form fields to be retained, so that it does not need to be re-entered on subsequent visits to the Website or when navigating between different functions of the Website. The Customer may decline the use of Cookies by setting the appropriate prohibition in the settings of his/her device. At the same time, the Customer understands that rejecting and/or prohibiting the use of Cookies on the Customer's device may result in limitation of certain functions of the Website.

By using the Website, the Customer gives his/her consent to the Provider's use of web analytics tools. These tools are used for general analysis of Website usage and obtaining baseline data to improve the Website's functionality. Information obtained by the Provider through the use of web analytics (e.g., IP address and browser type) may be transmitted in anonymized form to the web analytics service server, stored and processed there. Using the appropriate settings on his/her device, the Customer may prohibit the relevant web analytics service from receiving data and storing Cookies from such services on his/her computer.

In the event of any comments, suggestions or claims regarding the processing of personal data for which the Provider is the controller, or regarding information confidentiality, it is necessary to contact the Provider by email: info@edemkyiv.com.ua, or at the address: 03065, Kyiv, Solomianskyi District, 51/16 Vaclav Havel Boulevard, Ukraine.