

Privacy Policy

Personal data processing and protection at ASTER Hotel Group.

This Policy explains how the Hotel processes and protects personal data in connection with reservations, stays, services and guest communications, regardless of the contact or booking channel.

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Website: www.asterhotelgroup.com

"HOLIDAY TIME" LLC

35 Minglar Street, Yakkasaray District, Tashkent 100015, Republic of Uzbekistan

TIN 302 803 991

1. About this Policy

This Privacy Policy applies to "HOLIDAY TIME" LLC, trading as Aster Hotel Group (the Hotel, we, us or our). It covers the processing of data about guests, newsletter subscribers, people arranging reservations and those contacting us for information or services: in person, by telephone, email or messaging channels, through intermediaries, on www.asterhotelgroup.com (the Website), and during check-in, stays and the provision of related hotel services.

We process personal data in accordance with the laws of the Republic of Uzbekistan, including the Law On Personal Data, and applicable requirements for hotel services.

2. Personal data we collect

2.1 Identity and registration data

- Name, date of birth, nationality, gender and signature, where required.
- Passport, identity-document, visa, residency or migration-registration information where required for reservation, check-in or legal reporting.
- Details of accompanying guests, including children, provided by the person making the reservation or their parent or legal guardian.

2.2 Contact, reservation and stay data

- Email address, telephone number, postal address and preferred contact method.
- Arrival and departure dates, room and rate selected, number and ages of guests, booking reference, travel details and special requests.
- Service requests, complaints, feedback and records of communications with us.
- Information about corporate bookers, travel agents or other persons arranging a stay on your behalf.

2.3 Payment and transaction data

- Payment method, payment status, transaction reference, billing details, invoices, refunds and chargeback information.
- Payment-card data may be processed directly by a bank or payment provider when paying at the Hotel, during booking or through an authorized remote-payment method. We do not ask guests to send complete card details by ordinary email.

2.4 Website and device data

- IP address, browser and device type, operating system, language, referring pages, viewed pages, timestamps and security logs.
- Cookie identifiers, analytics events and approximate location derived from an IP address, where analytics or similar technologies are enabled.
- Information generated when you interact with embedded maps, booking tools or other Website functions.

2.5 Marketing data

- Email address and newsletter language, communication preferences, the consent text or version, records of consent, subscription time and source, opt-out and delivery; technical information needed to operate and protect the form, including your IP address where recorded by the service.

3. How we obtain personal data

We obtain personal data:

- directly from you when booking, checking in, staying or requesting services: in person, by telephone, email, messaging channels or Website forms;
- from the person, company, travel agent or group organizer making a reservation for you;
- from Bnovo, online travel agencies and other booking or distribution channels that you choose to use;
- from payment providers and banks in connection with payment confirmation, fraud prevention, refunds or disputes; and
- automatically from your device when you use the Website, subject to applicable requirements;

If you provide personal data about another guest, you confirm that you are authorized to provide it, that the information is accurate, and that the guest has been informed of this Policy. A parent or legal guardian must provide information and any required consent for a minor.

4. Why we process personal data

Purpose	Typical data	Basis
Search, create, confirm, change and administer reservations	Identity, contact, booking, guest and transaction data	Steps requested before a contract; performance of the accommodation contract; consent or another lawful basis where required
Provide accommodation, breakfast, guest support and requested services	Identity, registration, stay, preference and communication data	Performance of the contract; compliance with law; protection of guests and Hotel operations
Process and reconcile payments, deposits, refunds and disputes	Transaction, billing, reservation and contact data	Performance of the contract; accounting and tax obligations; prevention of fraud
Meet registration, migration, tax, accounting, safety and law-enforcement duties	Identity, document, stay and transaction data	Compliance with applicable law and lawful requests
Operate, secure and improve the Website and booking journey	Device, log, cookie and analytics data	Consent where required; security and service-improvement purposes permitted by law
Send news and offers	Contact details, language and subscription records	Prior consent; you may unsubscribe at any time; see section 4.1
Handle questions, complaints and legal claims	Contact, communication, booking and transaction data	Performance of the contract; compliance with law; establishment or defense of legal claims

4.1 Email newsletter subscription

"HOLIDAY TIME" LLC, trading as Aster Hotel Group, sends news, promotions and special offers by email only with your prior consent. Subscription is voluntary: declining it does not affect reservations, accommodation or guest services. Providing an email address for a reservation does not by itself constitute consent to marketing emails.

To manage your subscription, we process your email address, selected language, the text or version of the consent you accepted, records of consent, subscription time and source, and unsubscribe records, and technical information needed to deliver emails and protect the form, including your IP address where recorded by the service. We use this data to send newsletters, record consent, manage subscriptions and keep the subscription process secure.

We use MailerLite to manage the subscriber list and send emails on our behalf. Your subscription is activated when you submit the Website form after selecting the checkbox to consent to marketing emails and the processing of your email address for that purpose. The checkbox is not pre-selected. No additional confirmation by email is required. MailerLite's privacy policy is available at <https://www.mailerlite.com/legal/privacy-policy>. Section 7 describes processing abroad.

You may unsubscribe from marketing emails and withdraw your consent to processing for this purpose at any time using the unsubscribe link in each marketing email or by contacting ceo@asterhotelgroup.com. Marketing emails stop after you unsubscribe. Unsubscribing does not

prevent necessary messages about your reservation, payment or stay that are sent on a separate lawful basis.

5. When data is required

Some information is necessary to create or perform a reservation, identify the guest, accept payment or comply with legal registration duties. If required information is not provided, we may be unable to complete a booking, permit check-in or provide a requested service. Optional information and marketing choices may be withheld without affecting the core accommodation service, unless the information is needed for a specific request.

6. Booking, payment and technology providers

We use the following services and categories of data recipients to manage reservations, serve guests, accept payments and operate the Website:

- Bnovo - online booking and reservation management;
- MailerLite - subscriber-list management and newsletter delivery on our behalf;
- banks and payment providers - payment processing and confirmation, refunds and disputes; the provider and its terms are identified during payment;
- hosting, technical-support, email and communications services - Website operation and correspondence with guests;
- Google Analytics - visitor statistics and Website performance analysis; Google Maps - displaying the Hotel location;
- travel agents, booking platforms and organizations - where you book through them or authorize them to arrange your trip;
- competent public authorities - where required by law.

Data is shared to the extent necessary for the relevant service or obligation. We do not sell personal data. Third-party services also apply their own privacy terms.

7. International transfers and localization

International booking, payment, email, map and analytics services may process data outside Uzbekistan. Transfers and storage abroad are permitted only where the grounds and safeguards required by applicable law are in place. Mandatory requirements to store certain categories of data in Uzbekistan and register the relevant databases continue to apply.

For the new MailerLite platform, the provider identifies the Netherlands as the primary database location; its published sub-processor list also identifies Google Cloud EMEA Ltd (Ireland) and Vercom S.A. (Poland). MailerLite's terms allow cross-border processing involving affiliates and service providers, so we do not represent that all processing is confined exclusively to the EU. Transfers and further processing of subscriber data are permitted only in compliance with the laws of the Republic of Uzbekistan. Information about recipients and processing countries may be requested using the contact details in section 15.

8. Cookies and similar technologies

The Website and connected services use cookies and similar technologies for booking functions, preferences, security and visitor analytics. Google Analytics helps us assess Website use, and Google Maps provides map functions.

You can restrict or delete cookies in your browser settings. This may affect some Website and booking functions. Where applicable law requires consent for processing, it is requested separately. This Policy does not itself replace that consent.

9. Data retention

Passport copies collected at check-in are kept on the Hotel computer and in paper form for one month. Electronic copies are then deleted and paper copies destroyed. A particular copy may be retained longer if required by law or a lawful request from a competent authority.

This period applies specifically to passport copies. Booking, stay-registration and payment records, and correspondence, are retained for as long as needed to serve the guest, meet mandatory requirements and handle enquiries or disputes. Website and analytics data is retained according to the relevant service settings and applicable requirements.

Newsletter data is processed until consent is withdrawn or the newsletter is discontinued, whichever occurs first. Data used solely for the newsletter is then deleted or destroyed unless a separate legal basis permits further processing. Consent or opt-out records may be retained after the subscription ends only on such a basis, to the necessary extent and for the relevant period; they are not used to resume marketing without new consent.

When there is no longer a basis for retention, data is deleted, destroyed or anonymized. Where legal retention is required, use is limited to the relevant purpose.

10. Security

We use proportionate legal, organizational and technical safeguards designed to protect personal data against unauthorized access, loss, alteration, disclosure or destruction. Measures may include access controls, confidentiality duties, secure connections, logging, backups, vendor management and staff procedures. No internet transmission or storage system can be guaranteed to be completely secure.

11. Your rights

Subject to applicable law, you may:

- ask whether we process your personal data and request information about its composition, purposes, methods, recipients, transfers and retention;
- request access to, correction or completion of inaccurate personal data;
- request temporary suspension, restriction, deletion or destruction where data is incomplete, outdated, inaccurate, unlawfully obtained or no longer necessary;
- withdraw consent in the same form in which it was given or in writing, including by email, without affecting the lawfulness of processing before withdrawal;
- object to or unsubscribe from direct marketing; and
- apply to the competent authority or a court to protect your rights and legitimate interests.

Send a request to ceo@asterhotelgroup.com or submit it in writing at Hotel reception. We may request information needed to verify your identity. Personal data is amended or supplemented no later than three days after a request; data found to be inaccurate is corrected without delay. After consent is withdrawn, processing may continue where another basis provided by law applies.

12. Children

Independent check-in is available from the age of 18 on presentation of a valid identity document. Minors may stay with a parent or legal guardian, subject to the required documents. A parent or legal guardian provides the child's information; where consent is required for processing, it is obtained in the form prescribed by law.

13. External links

The Website may contain links to booking channels, map services, social networks or other third-party sites. We are not responsible for the privacy practices of services we do not control. Review their privacy information before providing data directly to them.

14. Changes to this Policy

We may update this Policy to reflect changes in law, Hotel operations and the services we use. The version date appears at the beginning of this document. The current version is available on the Website, at reception and on request. Material changes are communicated where and as required by law.

15. Contact

For privacy questions or requests, contact:

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