

POLICY OF THE GLAVUPDK BRANCH AT THE MFA OF RUSSIA RECREATIONAL COMPLEX ZAVIDOVO ON THE PROCESSING OF PERSONAL DATA

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PURPOSE AND SCOPE OF THE DOCUMENT

This Policy of the GlavUpDK branch at the MFA of Russia Recreational Complex Zavidovo (hereinafter referred to as the Branch) in relation to the processing of personal data (hereinafter referred to as the Policy) regulates relations in personal data protection, in order to respect and protect the rights and freedoms of every person and, in particular, the rights to privacy, personal and family secrets, and protection of one's honour and good reputation.

The Policy shall be strictly followed by all employees of the Branch.

The Policy applies to all personal data of individuals processed by the Branch with the use of automation tools and without the use of such tools.

Any personal data subject has access to this Policy. The current version of the Policy is publicly available on the Internet at zavidovo.ru

DEFINITIONS

Personal data means any information relating directly or indirectly to identified or identifiable individuals, in particular: Full name, year, month, date and place of birth, address, information about family, social, property status, information about education, profession, income, information about health status, other data.

Processing of personal data means any action (operation) or a set of actions (operations) with personal data performed using automation tools or without using such tools, in particular: collection, receipt, recording, systematization, accumulation, storage, clarification (updating, changing), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data.

Personal data subjects:

- ❖ Branch employees;
- ❖ individuals the Branch has concluded civil law contracts with for the performance of work/provision of services;
- ❖ applicants for the Branch vacancies;
- ❖ individuals, including individual entrepreneurs the Branch has entered into civil law contracts with (customers and suppliers of the Branch);
- ❖ users of all Internet resources of the Branch, including the Internet website of the Branch zavidovo.ru.
- ❖ representatives of legal entities the Branch has entered into civil law contracts with (customers and suppliers of the Branch).

PRINCIPLES AND TERMS OF PERSONAL DATA PROCESSING

The security of personal data means the protection of personal data from unauthorized or accidental access, destruction, modification, blocking, copying, provision, distribution of personal data, and from other illegal actions related to personal data. The branch takes the necessary legal, organizational and technical measures to protect personal data.

The processing and security of personal data at the Branch is carried out in accordance with the requirements of the Constitution of the Russian Federation, Federal Law No. 152-FZ 'On Personal Data', and other regulatory legal acts.

When processing personal data, the Branch adheres to the following principles:

- ❖ legitimacy and fairness;
- ❖ restrictions on the processing of personal data to achieve specific, predetermined and legitimate goals;
- ❖ preventing the processing of personal data incompatible with the purposes of collecting personal data;
- ❖ preventing the unification of databases containing personal data, the processing of which is made for purposes incompatible with each other;
- ❖ processing personal data that meets the purposes of their processing.

The branch processes personal data under the terms established by the current legislation of the Russian Federation, in the presence of any (at least one) of the following conditions: processing of personal data is carried out with the consent of the personal data subject to the processing of his/her personal data, including when such consent is provided by the subject during work with the Branch's website by accepting the terms of the User Agreement, including this Policy;

- ❖ the personal data processing is required to achieve the goals provided for by law, for the implementation and execution of the functions, powers and duties imposed by the legislation of the Russian Federation on the operator;
- ❖ the personal data processing is required for the execution of an agreement a personal data subject is a party or beneficiary of, as well as for the purpose of concluding an agreement a personal data subject will be a party or beneficiary of;

- ❖ the personal data processing is required to exercise the rights and legitimate interests of the Branch or third parties, or to achieve socially significant goals, provided that this does not violate the rights and freedoms of the personal data subject;
- ❖ a personal data subject has given consent to the access of an unlimited number of persons to his/her personal data;
- ❖ processing of personal data subject to publication or mandatory disclosure under the federal law.

The branch is entitled to entrust the processing of personal data of citizens to third parties, on the basis of an agreement concluded with these persons.

Persons who process personal data on behalf of the Branch shall comply with the principles and rules for the processing and protection of personal data provided for by Federal Law No. 152-FZ 'On Personal Data'. For each person, a list of actions (operations) with personal data that will be performed by a legal entity carrying out the personal data processing, the purpose of processing is determined, the obligation of such a person to maintain confidentiality and ensure the safety of personal data during their processing is specified, with requirements for the protection of processed personal data specified, too.

In the cases established by the legislation of the Russian Federation, the Branch is entitled to transfer personal data of citizens.

For the purpose of providing information, the Branch may create publicly available sources of personal data of employees, including directories and address books. With an employee's consent, publicly available sources of personal data may include his/her last name, first name, patronymic, date and place of birth, position, contact phone numbers, and e-mail address. Information about an employee shall be excluded from publicly available sources of personal data at any time at the request of the employee or by decision of a court or other authorized state bodies.

The Branch shall destroy or depersonalize personal data upon achievement of the processing purpose or in case of loss of the need to achieve the processing purpose.

RIGHTS OF PERSONAL DATA SUBJECTS

An individual whose personal data is processed by the Branch is entitled to receive the following information from the Branch:

- ❖ confirmation of the presence or absence of the fact of processing personal data by the Branch, legal grounds and purposes of processing personal data;
- ❖ information about the methods of processing personal data used by the Branch;
- ❖ the name and location of the Branch;
- ❖ information about persons who have access to personal data or to whom personal data may be disclosed under an agreement entered into with the Branch or under the federal law;
- ❖ a list of processed personal data related to an individual who has sent a request, and

the source of its accessing, unless another procedure for accessing such data is provided for by federal law;

- ❖ information about the processing time of personal data, including the storage time;
- ❖ information on the procedure for the exercise by an individual of the rights provided for by the Federal Law 'On Personal Data' No. 152-FZ;
- ❖ information about the ongoing or intended cross-border transfer of personal data;
- ❖ name and address of the person processing personal data on behalf of the Branch;
- ❖ other information provided for by the Federal Law 'On Personal Data' No. 152-FZ or other federal laws.

An individual whose personal data is processed by the Branch is entitled at any time to:

- ❖ demand correction of his/her personal data, its blocking or destruction, including if the personal data is incomplete, outdated, inaccurate, illegally obtained or is not necessary for the stated purpose of processing;
- ❖ withdraw his/her consent to the processing of personal data;
- ❖ demand the elimination of illegal actions of the Branch in relation to his/her personal data;
- ❖ appeal against the actions or inaction of the Branch in the prescribed manner to Federal Service for Supervision of Communications, Information Technology and Mass Media (Roskomnadzor) or to the court if the individual believes that the Branch is processing his/her personal data in violation of the requirements of Federal Law No. 152-FZ 'On Personal Data' or otherwise violates his/her rights and freedoms;
- ❖ demand the protection of his/her rights and legal interests, including compensation for losses and/or compensation for moral damage in court in accordance with the established procedure.

LIABILITY

In case of failure to comply with the provisions of this Policy, the Branch shall be liable under the current legislation of the Russian Federation.

PLEASE NOTE

that any individual is entitled to seek clarification on all issues regarding the collection and processing of personal data by sending an official request by the Russian Post to the Branch. The request is to specify:

- ❖ surname, name, patronymic of the personal data subject;
- ❖ the number of the ID of the personal data subject, information about the date of issue of the specified document and the issuing authority;
- ❖ last name, first name, patronymic, number of the ID, information on the date of its issue and the issuing authority of the legal representative of the personal data subject;
- ❖ information confirming the participation of the personal data subject in relations

with the Branch or other information confirming the fact of processing personal data by the Branch;

- ❖ the signature of the personal data subject (or his/her legal representative). If the request is sent in electronic form, it is to be filled out as an electronic document and signed with an electronic signature in accordance with the legislation of the Russian Federation.

INFORMATION ABOUT IMPLEMENTED REQUIREMENTS FOR PERSONAL DATA PROTECTION

When processing personal data, the Branch takes the necessary legal, organizational and technical measures to protect personal data from unauthorized or accidental access, destruction, modification, blocking, copying, provision, dissemination of personal data, and from other illegal actions in relation to personal data.

In accordance with Federal Law No. 152-FZ 'On Personal Data', such measures include:

- ❖ identification of threats to the security of personal data during its processing in personal data information systems;
- ❖ taking organizational and technical steps to ensure the security of personal data during its processing in personal data information systems, necessary to meet the requirements for the protection of personal data, the fulfillment of which is ensured by the levels of personal data protection established by the Government of the Russian Federation;
- ❖ application of the information protection means that have passed the procedure for assessing the conformity in the prescribed manner;
- ❖ assessment of the effectiveness of steps taken to ensure the security of personal data prior to the commissioning of the personal data information system;
- ❖ detecting facts of unauthorized access to the personal data and taking appropriate steps;
- ❖ recovery of personal data modified or destroyed due to the unauthorized access;
- ❖ establishment of rules for access to the personal data processed in the personal data information system, and ensuring registration and accounting of all actions performed with it in the personal data information system;
- ❖ control over the steps taken to ensure the security of personal data and the level of protection of personal data in the information systems;
- ❖ accounting of personal data storages;
- ❖ controlling access to the Branch's grounds;
- ❖ arrangement of technical means for processing personal data within the protected area;
- ❖ maintenance of technical means of protection and alarms on standby alert;
- ❖ monitoring user actions and proceedings on violations of personal data security requirements.

In order to coordinate actions to ensure the security of personal data, the Branch has appointed persons in charge of ensuring the security of personal data.