# PERSONAL DATA PROCESSING POLICY of OOO Anketolog Institute of Public Opinion

1. **GENERAL PROVISIONS**

This Personal Data Processing Policy (hereinafter referred to as the Policy) has been developed in accordance with Federal Law No. 152-ФЗ On Personal Data of July 27, 2006 (hereinafter referred to as Federal Law No. 152).

This Policy establishes a procedure for personal data processing and personal data security measures at OOO Anketolog IPO (hereinafter referred to the Operator) in order to protect human and civil rights and freedoms when processing personal data, including rights to personal and family privacy.

This Policy is a publicly available document of the Operator and can be made available to any persons.

The following basic concepts are used in this Policy:

**Automated personal data processing**– computer aided processing of personal data;

**Blocking of personal data**– temporary suspension of the processing of personal data (unless the processing is necessary to refine personal data);

**Personal data information system**– a set of personal data available in databases and information technologies and technical means that ensure their processing;

**Anonymization of personal data**– any actions that make any specific data subject no longer identifiable without using additional information;

**Processing of personal data**– any action (operation) or a set of actions (operations) performed with or without using means of automation, including collection, recording, systematization, accumulation, storage, refinement (updating, modification), retrieval, use, transfer (dissemination, sharing, making accessible), anonymization, blocking, deletion, and destruction of personal data;

**Operator**– a public authority, municipal authority, legal entity or individual who (either alone or jointly with other persons) arranges and/or performs personal data processing and determines the purposes of personal data processing, the composition of personal data to be processed, and actions (operations) in respect of personal data;

**Personal data**– any information relating to a directly or indirectly identified or identifiable individual (data subject);

**Sharing of personal data**– any actions aimed at disclosing personal data to a specific person or specific group of persons;

**Dissemination of personal data**– any actions aimed at disclosing personal data to the general public (transfer of personal data) or making personal data known to the general public, including public disclosure of personal data to mass media, publication in information and telecommunications networks, or otherwise making personal data accessible;

**Cross-border transfer of personal data**– transfer of personal data to a foreign state, authority of the foreign state, foreign individual or foreign legal entity.

**Destruction of personal data**– any actions making it impossible to restore personal data in the personal data information system and/or resulting in destruction of tangible media of personal data.

The Operator shall publish or otherwise make this Personal Data Processing Policy fully accessible according to Part 2 of Article 18.1 of Federal Law No. 152.

# PRINCIPLES AND CONDITIONS OF PERSONAL DATA PROCESSING

* 1. **Principles of Personal Data Processing**

The processing of personal data by the Operator is based on the following principles:

− Processing personal data on a legal and fair basis;

− Processing personal data only for specific, pre-determined and legitimate purposes;

− Preventing any personal data processing incompatible with the purposes of personal data collection;

− Preventing integration of databases with personal data if purposes of their processing are incompatible;

− Processing only personal data that meet the purposes of their processing;

− Ensuring that the content and amount of personal data to be processed are consistent with the stated processing purposes;

− Preventing processing of personal data which are excessive for the stated processing purposes;

− Ensuring that personal data are accurate, sufficient and relevant in relation to the purposes of personal data processing;

− Destructing or anonymizing personal data as soon as the purposes of their processing are achieved or become irrelevant, or if the Operator cannot eliminate violations of personal data processing, unless otherwise provided by the federal law.

# Conditions of Personal Data Processing

The Operator shall process personal data if at least one of the following conditions is met:

− Processing of personal data is subject to the consent of the data subject to processing of their personal data;

− Processing of personal data is necessary to achieve the purposes provided by the international treaty of the Russian Federation or by law, or to perform the functions, powers and obligations imposed on the Operator by applicable laws of the Russian Federation;

− Processing of personal data is necessary to deliver justice, execute a court order or order of another authority or official to be executed subject to the enforcement proceedings laws of the Russian Federation;

− Processing of personal data is necessary to perform a contract to which the data subject is a party, beneficiary or a surety, or to conclude a contract at the request of the data subject or a contract under which the data subject will be a beneficiary or a surety;

− Processing of personal data is necessary to exercise rights and legitimate interests of the Operator or third parties, or to achieve socially significant purposes provided that no rights or freedoms of the data subject are infringed upon;

− Processing of personal data which is made accessible to general public by or at the request of the data subject (hereinafter referred to as the publicly available personal data);

− Processing of personal data which are to be published or disclosed in accordance with the federal law.

# 2.3 Confidentiality of Personal Data

The Operator and other persons that have gained access to personal data shall not disclose personal data to any third parties or disseminate personal data without the consent of the data subject, unless otherwise provided by the federal law.

# Publicly Available Sources of Personal Data

For the purpose of information support, the Operator may establish publicly available sources of personal data of data subjects, including directories and address books. Subject to the written consent of the data subject, publicly available sources of personal data may include their first name, last name, patronymic, date and place of birth, position, contact telephone numbers, e-mail address, and other personal data provided by the data subject.

Information on the data subject shall be removed from the publicly available sources of personal data at any time at the request of the data subject or subject to decision of a court or other competent public authorities.

# Special Categories of Personal Data

The Operator may process special categories of personal data related to race, ethnicity, political opinions, religious or philosophic beliefs, health status, and private life in cases where:

− The data subject has provided their written consent to processing of their personal data;

− The data subject has made their personal data publicly available;

− Personal data are processed according to social security laws, labor laws or laws of the Russian Federation on state-provided and retirement pensions;

− Processing of personal data is necessary to protect life, health or other vital interests of the data subject or life, health or other vital interests of other persons, and obtaining of the data subject’s consent is impossible;

− Personal data are processed for medical, disease prevention and diagnostic purposes, for provision of medical, health care and social services provided that processing of personal data is performed by a medical professional who is obliged to maintain medical confidentiality subject to the laws of the Russian Federation;

− Processing of personal data is necessary to establish or exercise the rights of the data subject or third parties, or to deliver justice;

− Processing of personal data is performed in accordance with the laws on compulsory types of insurance and other insurance laws.

Processing of special categories of personal data shall be immediately terminated as soon as the reasons for their processing are removed, unless otherwise established by the federal law.

Personal data on criminal record may be processed by the Operator only in the cases and in the manner established by the federal laws.

# Biometric Personal Data

Information relating to the physiological and behavioral characteristics of persons which allow them to be identified (biometric personal data) can only be processed by the Operator with the written consent of the data subject.

# Delegation of Personal Data Processing to a Third Party

Unless otherwise established by the federal law, the Operator is entitled to delegate processing of personal data to a third party with the consent of the data subject under a contract entered into with the third party. A person processing personal data on behalf of the Operator shall follow the principles and rules of data processing set forth in Federal Law No. 152.

# Cross-border Transfer of Personal Data

Before beginning any transfer, the Operator shall make sure that the foreign state to which personal data are to be transferred provides for adequate protection of the data subject’s rights.

Cross-border transfer of personal data to foreign states which do not ensure adequate protection of the data subject’s rights is allowed in the following cases:

− Subject to the data subject’s written consent to cross-border transfer of their personal data;

− Under a contract to which the data subject a party.

# RIGHTS OF THE DATA SUBJECT

* 1. **Consent of the Data Subject to Processing of their Personal Data**

The data subject shall make a decision to provide their personal data and give consent to processing thereof freely, voluntarily and for their own benefit. The consent to processing of personal data may be given by the data subject or their representative in any form making it possible to confirm the receipt thereof, unless otherwise established by the federal law.

The obligation to provide a proof of obtaining the data subject’s consent to processing of their personal data or to prove the existence of the grounds listed in Federal Law No. 152 shall be imposed on the Operator.

# Rights of the Data Subject

The data subject is entitled to obtain any information related to processing of their personal data from the Operator, unless such right is restricted in accordance with applicable federal laws. The data subject is entitled to demand that the Operator refine, block or destruct their personal data in case the personal data is incomplete, outdated, inaccurate, illegally obtained or not required for the stated processing purpose, and that the Operator protect their rights as provided for by the law.

Processing of personal data for the purpose of market promotion of products or services through direct contacts with potential customers using means of communication and for the purposes of political agitation is allowed only with the prior consent of the data subject. Said processing of personal data shall be deemed to be performed without the prior consent of the data subject, unless the Operator proves that such consent has been obtained.

At the request of the data subject, the Operator shall immediately stop processing of their personal data for the above mentioned purposes.

Except as otherwise provided by the federal laws or where the data subject’s written consent is available, it is prohibited to make decisions based solely on automated processing of personal data if such decisions would have a legal effect on data subjects or otherwise affect their rights and legitimate interests.

In case the data subject believes that the Operator processes their personal data in violation of requirements of Federal Law No. 152 or otherwise violates their rights and freedoms, the data subject is entitled to appeal against actions or omissions of the Operator by filing a complaint to the Authority competent to protect the rights of data subjects or to the court.

A data subject is entitled to protect their rights and legitimate interests, including reimbursement of damages and/or compensation for moral injury, in the court.

# PERSONAL DATA SECURITY

Security of personal data processed by the Operator shall be ensured through legal, organizational and technical measures required for ensuring the compliance with federal laws on personal data protection.

In order to prevent unauthorized access to personal data, the Operator shall apply the following organizational and technical measures:

− Appoint officials responsible for arrangement of processing and protection of personal data;

− Restrict the number of persons who have access to personal data;

− Ensure that data subjects know the requirements of federal laws and regulatory documents of the Operator on processing and protection of personal data;

− Arrange record-keeping, storage and handling of information media;

− Identify personal data security threats that may occur during processing thereof, create related threat models;

− Develop a personal data protection system on the basis of a threat model;

− Verify the readiness and efficiency of information security facilities;

− Assign access privileges to users to enable their access to information resources and data processing firmware;

− Register and keep record of user activity in personal data information systems;

− Use antivirus software and recovery software for the personal data protection system;

− Use firewalling, intrusion detection, data security analysis and encryption facilities where required;

− Arrange controlled access to the premises of the Operator and protection of rooms with personal data processing facilities.

# FINAL PROVISIONS

Other rights and obligations of the Operator as the data operator shall be determined by the personal data laws of the Russian Federation.

Officials of the Operator who are guilty of violating the regulations governing personal data processing and security shall assume financial, disciplinary, administrative, civil or criminal liability as prescribed by the federal laws.

Any persons involved in processing of personal data on behalf of the Operator shall be held liable for misuse of personal data in accordance with the terms and conditions of the civil law contract between the Operator and the contracting party or the Confidentiality Agreement.