

Personal Data Policy

1. General Provisions

The Personal Data Policy of the Agency for Strategic Initiatives (ASI) has been developed in accordance with Part 2 of Article 18.1 of Federal Law No. 152-FZ “On Personal Data” dated July 27, 2006 and is intended to provide unrestricted access to information regarding the processing of personal data, as well as information about the requirements for the protection of personal data in ASI.

This Policy describes the procedure for processing and protecting personal data of individuals in connection with labor relations, the conclusion of contracts and the fulfillment of contractual obligations of ASI.

Personal data belongs to the category of confidential information and is protected from unauthorized, inter alia, accidental, access thereto.

2. Key Personal Data Definitions

Personal data shall mean any information pertaining directly or indirectly to a specific or identifiable individual (personal data subject).

Personal data operator shall mean a legal entity that independently or jointly with third parties organizes and performs the processing of personal data, as well as determines the purposes of processing, the composition of personal data and actions in relation thereto.

Personal data subject shall mean an individual whose personal data is processed by the personal data operator.

Personal data processing shall mean any action performed with personal data, including collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, transmission (distribution, provision, access), depersonalization, blocking, deletion, and destruction.

Automated personal data processing shall mean the personal data processing using computer technology.

Personal data dissemination shall mean actions aimed at the disclosure of personal data to an indefinite range of persons.

Personal data provision shall mean actions aimed at the disclosure of personal data to a certain person or a certain range of persons.

Personal data destruction shall mean actions resulting in the impossibility of restoring the content of personal data in the personal data information system or in the destruction of tangible personal data carriers.

Personal data depersonalization shall mean actions resulting in the impossibility to determine the identity of a specific personal data subject without the use of additional information.

Personal data information system shall mean a set of personal data contained in databases, as well as information technologies and technical means that ensure their processing.

3. Personal Data Processing

ASI processes personal data for the purpose of:

- ensuring compliance with laws and other regulations;
- assisting personnel in employment, training and promotion, ensuring the personal safety of employees, monitoring the scope and quality of work performed, ensuring the safety of property;
- conclusion of civil law contracts and performance of contractual obligations.

The legal grounds for personal data processing in ASI are the Labor Code of the Russian Federation, the Tax Code of the Russian Federation, the Civil Code of the Russian Federation, Federal Law No. 27-FZ "On Individual (Personalized) Accounting in the Mandatory Pension Insurance System" dated 01.04.1996, the ASI Articles of Association, civil law contracts, Consent of Personal Data Subjects.

ASI processes personal data of the following subjects:

- ASI employees and applicants for vacant positions;
- close relatives of ASI employees;
- individuals (applicants).

The composition of the processed personal data does not contain special categories of personal data concerning race, nationality, political views, religious or philosophical beliefs, health status, intimate life. Biometric personal data is not processed. A specific list of subjects' personal data processed in ASI shall be approved by a separate internal act.

Personal data shall be collected directly from the personal data subject. If the provision of personal data is mandatory in accordance with the law, the legal consequences of a refusal to provide such data shall be explained to the personal data subject.

Personal data may be obtained from a third party only if there are legal grounds. Upon the receipt of personal data from a third party, the subject shall be duly notified.

Personal data may be collected from publicly available sources or in the case when personal data is made publicly available by the subject or at his request. In this case, obtaining consent to the personal data processing and notifying the subject will not be required.

When collecting personal data, inter alia, through the Internet, the recording, systematization, accumulation, storage, clarification (updating, modification), extraction of personal data of nationals of the Russian Federation using databases located on the Russian Federation shall be ensured.

When processing personal data, ASI shall perform the following actions: collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, transmission (distribution, provision, access), blocking, deletion, destruction.

Personal data shall be processed both on tangible (paper) carriers and in electronic form (in personal data information systems, on machine-readable carriers) with transmission via the internal network of a legal entity.

The personal data storage shall be carried out in a form that allows determining the personal data subject for no longer than the purposes of personal data processing require, unless the period of personal data storage is stipulated by law or an agreement to which the personal data subject is a party.

The personal data shall be stored with the confidentiality rules being observed.

In case of confirmation of personal data inaccuracy, the operator shall update the personal data.

Personal data shall be archived in accordance with the legislation of the Russian Federation on archival affairs, destroyed or depersonalized upon achievement of processing purposes or in case the need to achieve these purposes ceases to exist, unless otherwise provided by law.

If illegality of personal data processing is revealed, such personal data shall be destroyed.

Personal data may be transferred to a third party only with the consent of the personal data subject or in cases expressly provided for by the legislation of the Russian Federation. Personal data transfer to a public authority, local government, security and law enforcement agency, a state institution and a foundation, as well as to any other authorized body shall be allowed on the grounds provided for by the legislation of the Russian Federation. Personal data may be transferred by the Autonomous Non-Profit Organization "National Technology Initiative Platform" for the purpose of publishing the same on the Leader-ID website.

Personal data disclosure to a third party without the written consent of the relevant subject shall be prohibited, except in cases where it is necessary to protect the life, health or other vital interests of the personal data subject.

Personal data disclosure to a third party for commercial purposes without the written consent of the relevant subject shall be prohibited. Personal data may be processed for the purpose of promoting goods, works, and services on the market, as well as for the purposes of political agitation, only with the prior consent of the subject.

The following persons shall have the right of access to the personal data processed in ASI:

- Director General of ASI;
- ASI employees for whom the processing of personal data is necessary in connection with the performance of their official duties;
- employees under civil law contracts on the basis of an executed (agency) agreement.

The management may allow employees to access personal data by a separate internal act.

Any subject whose personal data is processed in ASI has the right to access their personal data, including the following information:

- confirmation of the fact of their personal data processing;
- legal grounds and purposes of their personal data processing;
- purposes and methods of personal data processing used by the operator;
- name and location of the operator, information about persons who have access to personal data (except for the operator's employees) or to whom personal data may be disclosed on the grounds of an agreement with the operator or on the grounds of legislation;
- list of processed personal data related to the relevant subject, and the source of such data;
- terms of personal data processing and storage;
- procedure for the exercise of the subject's rights provided for by law;

- name of the person processing personal data on behalf of the operator if the processing is entrusted to a third party.

In order to fulfill the duties provided for by the personal data legislation by ASI, the following measures shall be taken:

- appointment of a person responsible for the organization of personal data processing;
- publication of documents defining the policy regarding the personal data processing, local acts on the personal data processing, as well as local acts establishing procedures aimed at preventing and detecting violations of the legislation of the Russian Federation, eliminating the consequences of such violations;
- application of legal, organizational and technical measures to ensure the personal data security;
- familiarization of the operator's employees with the provisions of the legislation and local acts of the operator.

4. Personal Data Protection

When processing personal data, the necessary legal, organizational and technical measures shall be taken to protect personal data from unauthorized or accidental access, destruction, modification, blocking, copying, provision, dissemination, as well as from other illegal actions with respect to personal data.

In order to ensure the security of personal data, the following activities are carried out in ASI:

- application of organizational and technical measures to ensure the security of personal data during their processing in information systems that ensure compliance with the requirements for the established security levels;
- assessing the efficiency of measures taken to ensure the security of personal data processed in personal data information systems;
- accounting of machine-readable personal data carriers;
- detection of unauthorized access to personal data and response to these incidents;
- recovery of personal data modified or destroyed due to unauthorized access;
- establishment of rules for access to personal data processed in personal data information systems;
- registration and accounting of actions performed with personal data in personal data information systems;
- control over the measures taken to ensure the security of personal data in accordance with the established personal data security level.

5. Liability

For violation of the requirements stipulated by the legislation of the Russian Federation, the Regulations and other local acts of ASI, employees and other persons who have access to personal data shall be subject to disciplinary, administrative, civil and criminal liability in accordance with the federal laws of the Russian Federation.

6. Final Provisions

This Policy shall be effective once approved and shall be in effect indefinitely.

The Policy may be amended by separate acts of ASI.

Unrestricted access to this Policy is provided to all persons concerned, including personal data subjects and authorities exercising control and supervisory functions in the field of personal data.