

Personal Data Processing Policy

1. General provisions

1.1. This Personal Data Processing Policy (hereinafter – the Policy) was developed in accordance with the Federal Law No 152-FZ "About personal data" dated July 27, 2006.

1.2. This Policy determines the procedure for personal data processing and measures to ensure the personal data security in the Moscow Agency of Innovations (hereinafter — the Operator) in order to protect the rights and freedoms of a person and citizen in their personal data processing, including protecting the rights to privacy, personal and family secrets.

1.3. In accordance with the Policy, the Operator collects, uses and protects personal data that personal data subjects provide to the Operator when using the site/sites owned by the Operator/administrated by the Operator, from any device and when communicating in any form.

1.4. The concepts used (mentioned) in the Policy applicable to the personal data processing, including, but not limited to: collection, recording, systematization, accumulation, storage, clarification (update, change), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data, etc., are used (mentioned, applied) in the understanding established by Art. 3 of the Federal Law No 152-FZ dated July 27, 2006 "About Personal Data" (hereinafter - FZ No 152).

1.5. The Operator publishes this Policy on its official website/websites in the public domain in accordance with Part 2, Art. 18.1., Federal Law No.152.

2. Principles, purposes and conditions for the processing of personal data

2.1. Processing of personal data by the Operator is carried out on the basis of the following principles:

- legitimacy and fair basis;
- limiting the processing of personal data to the achievement of specific, predetermined and legitimate purposes;
- preventing the personal data processing that is incompatible with the purposes of collecting personal data;
- preventing the merger of databases containing personal data, the processing of which is carried out for purposes incompatible with each other;
- processing only those personal data that meet the purposes of their processing; compliance of the content and scope of the processed personal data with the stated purposes of processing;
- preventing the processing of personal data that is excessive in relation to the stated purposes of their processing;
- ensuring the accuracy, sufficiency and relevance of personal data in relation to the purposes of processing personal data;
- destruction or depersonalization of personal data upon reaching the goals of their processing or in case of loss of the need to achieve these goals, if it is impossible for the Operator to eliminate the committed violations of personal data, unless otherwise provided by federal law.

2.2. The Operator processes the following personal data:

- personal data provided by personal data subjects when filling in the information fields on the Operator's website/websites, including, but not limited to, the fields contained in: contact forms, newsletter subscriptions, event registration forms, applications, in declarations, assurances, etc.;
- personal data and other information contained in messages that the subject of personal data sends/addresses directly to the Operator;
- technical data that is automatically transmitted by the device through which the site/sites are used, including the technical characteristics of the device (device identifier), IP address, cookies sent to the device of the subject of personal data, information about the browser, date and time of access to the site, addresses of the requested pages and other similar information.

2.3. The Operator processes personal data solely for the purposes for which they were provided, including:

- registration of the subject of personal data on the website / websites of the Operator to provide access to its individual sections;
- providing the subject of personal data with information about the Operator, services and activities of the Operator;
- communication with the subject of personal data, when he contacts the operator;
- organizing the participation of the subject of personal data in the events and oppositions held by the Operator;
- sending to the subject the personal data of the Operator's news materials;
- exercising the powers and duties assigned to the Operator by the legislation of the Russian Federation;
- for other purposes with the consent of the subject of personal data, indicating the purposes of processing when obtaining consent.

2.4. The operator processes technical data for:

- ensuring the functioning and security of the Operator's website/websites (the administrator of which is the Operator);
- improving the quality of the Operator's website/websites (the administrator of which is the Operator).

3. Cookies

3.1. The Operator on the site/sites may use "cookies" that are automatically downloaded to the Subject's device and store information on setting up the user interface in accordance with the preferences of the Personal Data Subject. The subject has the right to make settings for the devices he uses in order to prohibit (turn off) the storage of files "cookies" on the device of the Subject or their deletion.

4. Confidentiality of personal data

4.1. The operator and other persons who have gained access to personal data are obliged not to disclose to third parties and not to distribute personal data without the consent of the subject of personal data, unless otherwise provided by federal law.

4.2. The operator does not place personal data in public sources. The Operator does not make decisions that give rise to legal consequences for personal data subjects or otherwise affect their rights and legitimate interests based solely on automated processing of personal data.

5. Entrusting of the personal data processing to another person

5.1. The operator has the right to entrust the processing of personal data to another person with the consent of the subject of personal data, unless otherwise provided by federal law, on the basis of an agreement concluded with this person. A person who processes personal data on behalf of the Operator is obliged to comply with the principles and rules for processing personal data provided for by Federal Law No. 152 and this Policy.

6. Rights of the personal data subject

6.1. In order to ensure the protection of the rights and freedoms of the subject of personal data, the Operator, at the request of the subject of personal data (written request):

- confirms the processing of personal data of the subject requesting information in relation to himself;
- provides an opportunity for the subject of personal data to get acquainted with his personal data held by the Operator within 30 days from the date of receipt of a written request;

- informs the subject of personal data about the source of receipt and the composition of his personal data processed by the Operator;
- informs the subject of personal data about the legal grounds, purposes, terms and methods of processing his personal data;
- makes the necessary changes to personal data, if the subject of personal data confirms that they are incomplete, inaccurate or out of date, within 7 working days from the date of receipt of confirmation, and notifies the subject of personal data of the changes made;
- informs the subject of personal data about the name and location of organizations that have access
- informs the subject of personal data about the legal grounds, purposes, terms and methods of processing his personal data;
- makes the necessary changes to personal data, if the subject of personal data confirms that they are incomplete, inaccurate or out of date, within 7 working days from the date of receipt of confirmation, and notifies the subject of personal data of the changes made;
- informs the personal data subject of the name and location of organizations that have access to his personal data (if the Operator has such information) and which personal data can be disclosed with the consent of the personal data subject;
- informs the subject of personal data of the name or surname, first name, patronymic and position of persons who, with the consent of the subject of personal data, may be entrusted with the processing of his personal data;
- notifies the subject of personal data about the procedure for exercising his rights when processing his personal data by the Operator;
- excludes the subject of personal data from the distribution of the Operator's news materials;
- terminates the processing of personal data within 30 days from the date of receipt of the withdrawal of consent, unless there are legal grounds for processing personal data provided for by the legislation of the Russian Federation;
- terminates the processing of personal data if it is confirmed that the Operator is processing them unlawfully, and notifies the personal data subject of the measures to be taken;
- destroys personal data if it is confirmed that the data is illegally obtained or does not correspond to the stated purposes of processing, within 7 working days from the date of receipt of the relevant confirmation, and notifies the subject of personal data of the measures to be taken;
- answers other questions regarding personal data processed by the Operator.

6.2. The subject of personal data decides to provide his personal data and agrees to their processing freely, by his own will and in his own interest. Consent to the processing of personal data can be given by the subject of personal data or his representative in any form that allows confirming the fact of its receipt, unless otherwise provided by federal law.

6.3. The operator does not process personal data in order to promote goods on the market by making direct contacts with the subject of personal data (potential consumer) using means of communication, as well as for the purposes of political campaigning.

6.4. If the subject of personal data believes that the Operator is processing his personal data in violation of the requirements of Federal Law No. 152 or otherwise violates his rights and freedoms, the subject of personal data has the right to appeal against the actions or inaction of the Operator to the authorized body for the protection of the rights of subjects of personal data or in court .

6.5. The operator stops processing personal data:

- upon the establishment of conditions for terminating the processing of personal data or after the expiration of the established deadlines;
- upon achievement of the goals of the processing of the LNBO in case of loss of the need to achieve these goals;
- at the request of the subject of personal data, if the processed personal data is illegally obtained or is not necessary for the stated purpose of processing;

- in case of detection of illegal processing of personal data, if it is impossible to ensure the legality of processing;
- after the expiration of the consent of the subject of personal data to the processing of his personal data or in the event of withdrawal of such consent, if there are no other legal grounds for processing personal data provided for by the legislation of the Russian Federation;
- in case of liquidation of the Operator.

7. Ensuring the security of personal data

7.1. The security of personal data processed by the Operator is ensured by the implementation of legal, organizational and technical measures necessary to meet the requirements of federal legislation in the field of personal data protection.

7.2. To prevent unauthorized access to personal data, the Operator applies the following organizational and technical measures:

- appointment of officials responsible for organizing the processing and protection of personal data;
- restriction of the composition of persons admitted to the processing of personal data;
- familiarization of subjects with the requirements of federal legislation and the Operator's regulatory documents for the processing and protection of personal data;
- delimitation of user access to information resources and software and hardware means of information processing;
- registration and accounting of actions of users of information systems of personal data;
- the use of anti-virus tools and system recovery tools behind personal data;
- application, if necessary, of firewalls, intrusion detection;
- organization of access control to the territory of the Operator, protection of premises with technical means for processing personal data.

7.3. The operator takes the necessary and sufficient legal, organizational and technical measures to protect personal data from unauthorized or accidental access to them, their destruction, modification, blocking, copying, provision, distribution, as well as from illegal actions in relation to personal data.

8. Final provisions

8.1. Other rights and obligations of the Operator in connection with the processing of personal data are determined by the legislation of the Russian Federation in the field of personal data.

8.2. The Operator's employees who are guilty of violating the rules governing the processing and protection of personal data bear material, disciplinary, administrative, civil or criminal liability in the manner prescribed by federal laws.

8.3. The Operator's website(s) (administered by the Operator) may contain links to third party websites and services over which the Operator has no control.

8.4. The Operator is not responsible for the security or privacy of any information collected by third-party sites or services.

8.5. The Operator may update the Privacy Policy as necessary (including due to changes in personal data legislation).

8.6. Cross-border transfer of personal data may be carried out by the Operator solely in accordance with Art. 12 FNch N 152 and the legislation of the Russian Federation in the field of processing personal data, as well as with international treaties of the Russian Federation.

8.7. The use/continuation of use by the Operator's website/websites after the change of the Policy by the subject of personal data means confirmation of the consent of the subject of personal data with the changes made.