

POLICY **on Personal Data Processing**

1. General provisions

1.1. This Policy on Personal Data Processing (hereinafter referred to as the “Policy”) is used by the Roscongress Foundation, legal address: 12, Krasnopresnenskaya Naberezhnaya, entrance 7, office 1101, Moscow, 123610 (hereinafter referred to as the “Operator”), and is an official document that stipulates the principles, goals, conditions, timeframe, and methods for processing the personal data of Users of the Website roscongress.org and the Website’s Services, including the Roscongress personal account and mobile app (hereinafter referred to as “Users”, “Website”, and “Services”), the list of personal data that is being processed, the list of actions performed with such personal data, the rights of personal data subjects (Users), measures to monitor compliance with Russian legislation regarding the processing of personal data, and the measures that are taken to protect personal data.

1.2. This Policy has been prepared taking into account the requirements of legislative and other regulatory legal acts of the Russian Federation concerning personal data:

- Constitution of the Russian Federation
- Civil Code of the Russian Federation
- Federal Law No. 152-FZ dated 27 July 2006 “On Personal Data”
- Federal Law No. 149-FZ dated 27 July 2006 “On Information, Information Technologies, and Information Protection”
- Resolution No. 1119 of the Government of the Russian Federation dated 1 November 2012 “On the Approval of Requirements for the Protection of Personal Data Processed in Personal Data Information Systems”
- Order No. 21 of the Russian Federal Service for Technical and Export Control dated 18 February 2013 “On the Approval of the Scope and Content of Organizational and Technical Measures to Ensure the Security of Personal Data Processed in Personal Data Information Systems”
- Other regulatory legal acts of the Russian Federation and regulatory documents of authorized government bodies
- In-house regulations of the Operator

1.3. This Policy shall apply exclusively to the Website. The Operator shall not control or be responsible for third-party websites that the User to the Website may access via active links available on the Website and/or the Website Services.

1.4. The Operator’s processing of the personal data of other categories of personal data subjects who are not Users of the Website shall be governed by other internal regulations of the Operator.

1.5. This Policy shall take effect from the time it is posted on the Website and remain in effect indefinitely until the Operator approves a new version of the Policy and subsequently posts the new version of the Policy on the Operator’s website. The new version of the Policy shall take effect from the time it is posted online at the address specified in this clause, unless otherwise

stipulated in the new version of the Policy. The current version of the Policy is always available on the page at <https://rusdf.ru/en/>.

2. Key terms and definitions

2.1. This Policy uses the following terms and definitions:

2.1.1. Personal data information system – the entirety of the personal data contained in databases and the information technologies and technical equipment that support its processing.

2.1.2. Personal data processing – any action (operation) or set of actions (operations) with personal data performed with or without the use of automated tools, including the collection, recording, systematization, accumulation, storage, clarification (updating, modification), retrieval, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, or destruction of personal data.

2.1.3. Operator – a government agency, municipal body, legal entity, or individual that organizes and/or performs the processing of personal data independently or jointly with other entities and determines the purposes of the processing of personal data, the scope of personal data to be processed, and the actions (operations) performed with personal data.

2.1.4. Personal data – any information relating to an individual who has been directly or indirectly identified or is identifiable (personal data subject).

2.1.5. Website User – any person not registered on the Website who uses the Website’s navigation functionality solely for the purpose of reviewing the information provided therein.

2.1.6. Website – an Internet resource consisting of a collection of information and computer programmes contained in an information system that makes such information available online at the address <https://rusdf.ru/en/>.

2.1.7. Service Administration – the Roscongress Foundation (OGRN 1077799005426, INN 7706412930), registered at the following address: 12, Krasnopresnenskaya Naberezhnaya, entrance 7, office 1101, Moscow, 123610 (hereinafter referred to as the “Foundation”) (website address: roscongress.org).

2.1.8. Cookies – small text files placed on the hard drives of devices during the use of various websites. They aim to assist in customizing the user interface and contain information about the User’s previous visits to the Website.

2.1.9. IP address – the unique network address of the computer network node through which the User accesses the Website.

3. Processing the personal data of Website Users

3.1. Personal data is processed based on the following principles:

- Personal data shall be processed lawfully and fairly
- Personal data shall be processed only to achieve specific, predetermined, and legitimate purposes
- Personal data shall not be processed in a manner that is incompatible with the purposes for which it was collected
- Databases containing personal data that is being processed for incompatible purposes may not be combined
- Only personal data that meets the purposes for which it is being processed may be processed

– The scope and volume of personal data that is being processed must correspond with the stated purposes of processing, and there shall be no excess personal data processed with respect to the stated purposes of processing

– The accuracy, sufficiency, and, where necessary, relevance of personal data with respect to the purposes for which it is being processed shall be ensured when processing personal data, and the Foundation shall take or ensure that the necessary measures are taken to delete or correct incomplete or inaccurate personal data

– Personal data shall be stored in a form that makes it possible to identify the personal data subject for a period no longer than what is required for the purposes of processing the personal data, unless the storage period for personal data is prescribed by federal law or an agreement to which the personal data subject is a party, beneficiary, or guarantor

– Processed personal data shall be destroyed or anonymized once the purposes of its processing have been achieved or once there is no longer a need to achieve these purposes, unless otherwise stipulated by federal law

– Personal data shall not be disclosed to third parties or distributed without the consent of the personal data subject, unless otherwise stipulated by federal laws

3.2. List of personal data and the purposes of its processing:

3.2.1. Establishment of feedback with the website user, including sending and processing notifications and requests:

- Full name
- Telephone number
- Email address

3.2.2. Other purposes with the individual's consent.

3.2.3. Special categories of personal data related to race, nationality, political views, religious or philosophical beliefs, or intimate life may not be processed.

3.2.4. The processing of biometric personal data may not be processed.

3.2.5. The Foundation shall process personal data authorized for dissemination by the personal data subject based on the personal data subject's separate consent for dissemination in compliance with the prohibitions and conditions for the processing of personal data stipulated by the personal data subject.

3.3. List of actions with personal data and methods for processing it

3.3.1. The Operator shall perform the following actions with personal data: collection, recording, systematization, accumulation, storage, clarification (updating, modification), retrieval, use, transfer (provision, access), blocking, deletion, and destruction.

3.3.2. The automated processing of personal data is conducted with or without transmitting the information received over information and telecommunications networks.

3.3.3. Personal data is not transmitted across borders.

3.4. Conditions for processing personal data

3.4.1. Personal data shall be processed with the consent of the personal data subject, unless otherwise stipulated by applicable law.

3.4.2. The Foundation may entrust the processing of personal data to another entity with the consent of the personal data subject, unless otherwise stipulated by federal law based on an agreement concluded with said entity (hereinafter referred to as the “Operator’s Instructions”). The Operator’s Instructions stipulate the list of actions (operations) with personal data that shall be performed by the entity processing the personal data based on the instructions and the purposes of such processing, establish the obligation of said entity to maintain the confidentiality and ensure the protection of the personal data during its processing, and specify the requirements for the protection of the personal data being processed in accordance with Article 19 of the Federal Law “On Personal Data”.

3.4.3. The Operator shall not verify the accuracy of the information provided by the User and assumes that the User is providing accurate and sufficient information and ensuring that it is up to date.

3.4.4. Personal data shall be stored in a form that makes it possible to identify the personal data subject for a period no longer than required for the purposes for which it is being processed.

3.4.5. The processing of personal data may cease once the purposes of the processing of the personal data are achieved, the period for the processing of the personal data expires, the consent to the processing of the personal data is revoked, or the unlawful processing of personal data is detected.

3.4.6. Personal data shall be processed by employees whose job responsibilities include the processing of personal data, as well as by interns under the supervision of Foundation employees to the extent required for practical training, after they sign a personal data confidentiality agreement and review the provisions of the laws of the Russian Federation and the Foundation’s in-house regulations concerning personal data, including personal data protection requirements.

3.4.7. When taking decisions that affect the interests of personal data subjects, the Foundation may not rely solely on personal data obtained through automated processing. Decisions affecting the interests of personal data subjects shall not be based solely on automated data processing.

4. Data processing rules for statistics

4.1. To maintain statistics and analyse the Website’s performance, the Operator shall process the following information related to user preferences using metric services (including Yandex. Metrika), specifically:

- Cookies
- Information about the actions of Website Users
- gender
- age (age range)
- Information about the User’s equipment and browser
- IP address
- geolocation information
- Session date and time
- UTM tags
- Referrer (address of the previous page)

4.2. The information specified in paragraph 4.1 is automatically transferred by the Yandex Metrica service to Yandex LLC (16, Leo Tolstoy St., Moscow, 119021) to obtain statistical information available for further use by the Operator.

4.3. If the User rejects the cookies, he/she must stop using the Website or disable cookies in their browser settings.

5. Rights of personal data subjects

5.1. Personal data subjects may:

- Receive complete information about their personal data that is being processed by the Operator

- Access their personal data, including the right to receive a copy of any record containing their personal data, except in cases stipulated by federal law

- Update, block, or destroy their personal data upon request if it is incomplete, outdated, inaccurate, illegally obtained, or is not necessary for the stated purpose of processing

- Revoke their consent to the processing of personal data

- Take measures to protect their rights as stipulated by law

- Appeal any actions or inaction taken by the Operator in violation of the requirements of the laws of the Russian Federation concerning personal data to the authorized body in charge of protecting the rights of personal data subjects or in court

- Exercise other rights stipulated by applicable law

5.2. The rights of personal data subjects to access their personal data may be restricted in accordance with federal laws, including if such access violates the rights and legitimate interests of third parties.

5.3. Personal data subjects may revoke any consent they previously provided to the processing of their personal data at any time by coming in person or by sending a written request (including an electronic document signed with a simple electronic signature) electronically to info@roscongress.org or in writing to the following address: 12, Krasnopresnenskaya Naberezhnaya, entrance 7, office 1101, Moscow, 123610.

6. Personal data security measures for the Website

6.1. Primary measures taken by the Foundation to ensure the security of personal data:

6.1.1. The security of personal data shall be ensured during processing by preventing unauthorized, including accidental, access to personal data, which could result in the destruction, modification, blocking, copying, distribution, or other unauthorized actions with personal data.

6.1.2. Personal data security measures shall be determined taking into account potential threats to the vital interests of the individual, the public, and the state.

6.2. Measures taken by the Foundation to ensure the fulfilment of the operator's responsibilities when processing personal data:

6.2.1. The Foundation shall take legal, organizational, and technical measures to protect personal data against unauthorized or accidental access, destruction, modification, blocking, copying, provision, or distribution, as well as against other illegal actions with respect to personal data.

6.2.2. Measures that are essential and sufficient to ensuring the Foundation's fulfilment of its operator responsibilities stipulated by the laws of the Russian Federation concerning personal data and the Foundation's in-house regulations concerning personal data include:

- Appointing a person at the Foundation responsible for organizing the processing of personal data
- Adopting in-house regulations and other documents concerning the processing and protection of personal data
- Publishing or otherwise ensuring unrestricted access to the Policy
- Ensuring the Foundation's employees directly involved in the processing of personal data review the provisions of the laws of the Russian Federation and the Foundation's in-house regulations concerning personal data, including personal data protection requirements
- Obtaining consent from personal data subjects for the processing of their personal data, except in cases stipulated by the laws of the Russian Federation
- Separating personal data processed without automation from other information, in particular by recording it on separate personal data storage media in special sections
- Ensuring the separate storage of personal data and its physical media that are processed for different purposes and contain different categories of personal data
- Ensuring the security of personal data during its transmission over open communication channels
- Storing physical media containing personal data in compliance with conditions that ensure the safety of personal data and prevent unauthorized access thereto
- Ensuring internal control over the compliance of personal data processing with the Federal Law "On Personal Data" and the regulatory legal acts adopted in accordance therewith, the requirements for the protection of personal data, this Policy, and the Foundation's in-house regulations
- Providing information to personal data subjects or their representatives in the prescribed manner about the availability of personal data related to the relevant subjects and providing the opportunity to review this personal data upon request from said personal data subjects or their representatives, unless otherwise stipulated by the laws of the Russian Federation
- Ceasing the processing of and destroying personal data in cases stipulated by the laws of the Russian Federation concerning personal data
- Other measures stipulated by the laws of the Russian Federation concerning personal data

6.2.3. Measures to ensure the security of personal data during its processing in personal data information systems shall be established in accordance with the Foundation's internal regulations governing the security of personal data during its processing in personal data information systems.

7. Monitoring compliance with laws of the Russian Federation and the Foundation's in-house regulations concerning personal data, including personal data protection requirements

7.1. Compliance with the laws of the Russian Federation and the Foundation's in-house regulations concerning personal data, including personal data protection requirements, shall be monitored for the following purposes:

- To verify that the processing of personal data complies with these requirements

- To verify that the personal data protection measures used comply with these requirements
- To take measures aimed at preventing and detecting violations of the laws of the Russian Federation concerning personal data, identify possible leaks and unauthorized access to personal data, and mitigate the consequences of such violations

7.2. The person responsible for organizing the processing of personal data at the Foundation shall internally monitor compliance with the laws of the Russian Federation and the Foundation's in-house regulations concerning personal data, including requirements for the protection of personal data.

8. Contact information for direct communication with the Operator

8.1. 12, Krasnopresnenskaya Naberezhnaya, entrance 7, office 1101, Moscow, 123610, +7 (495) 640 4440, Email: info@roscongress.org

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