

Annex

APPROVED

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institution RAIN dated

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Personal Data Processing Policy
in the Private institution RAIN

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1. Purpose and scope of application

1.1. This Personal Data Processing Policy in the Private institution RAIN (hereinafter referred to as the Policy) defines the basic principles, objectives, conditions and methods for personal data processing, the lists of subjects and personal data processed in the private institution RAIN (hereinafter referred to as the Institution), the functions of the Institution in personal data processing and the rights of personal data subjects, as well as the requirements for personal data protection implemented in the Institution.

1.2. The Policy is developed to meet the requirements of the Constitution of the Russian Federation, legislative and other regulatory legal acts of the Russian Federation in the personal data framework.

1.3. The Policy provisions provide the basis for development of local regulatory acts governing personal data processing of the Institution employees and other personal data.

2. Terms and definitions

Term	Definition
Automated processing of personal data	personal data processing using computer software
Blocking of personal data	temporary suspension of personal data processing (except where data processing is needed to update the personal data)
Personal data information system	a set of personal data contained in personal data databases and information technologies and software, used for their processing
Information	information (messages, data) regardless of the presentation form
Personal data depersonalization	actions, which make it impossible to identify personal data, as related to a specific personal data subject, without using additional information
Personal data processing	any action (operation) or a series of actions (operations), performed using automation or without, including personal data acquisition, recording, classification, accumulation, storage, updating or modifying, extraction, usage, transfer (distribution, presentation, access), depersonalization, blocking, deleting and destruction of personal data

Processor	a state authority, municipal authority, legal entity or individual acting independently or jointly with other persons who organize and/or process personal data, as well as define the goals for personal data processing, contents of personal data, which is to be processed, actions (operations) to be performed with personal data
Personal data	any information relating directly or by implication to a specific individual (personal data subject)
Provision of personal data	actions, aimed at the disclosure of personal data to a certain person or a group of persons
Cross-border transfer of personal data	transfer of personal data to the territory of a foreign state
Destruction of personal data	actions which make it impossible to recover the contents of personal data in the personal data information system and/or which result in destruction of tangible media of personal data

3. Principles and purposes of personal data processing

3.1. The Institution, being the Personal Data Processor, carries out personal data processing of the Institution employees and other personal data subjects who are non-employees.

3.2. Personal Data Processing in the Institution is carried out taking into account the need to enable protection of human and civil rights and freedoms when processing personal data, including protection of the rights to privacy, personal and family secrets, based on the following principles:

Personal Data Processing is carried out in the Institution on the rule of law and an equitable basis;

Personal Data Processing is limited to achieving specific, predetermined and legitimate goals;

Personal Data Processing which is inconsistent with the purposes of personal data acquisition shall not be allowed;

It shall not be allowed to combine databases containing personal data processed for purposes incompatible with each other;

only personal data that meet the purposes of their processing shall be processed;

the contents and volume of the processed personal data correspond to the stated purposes of its processing. Processing personal data which are redundant with respect to the stated purposes of its processing shall not be allowed;

the accuracy, adequacy and relevance of personal data in relation to the purposes of personal data processing shall be ensured. The Institution shall take the necessary measures or ensure their adoption to delete or clarify incomplete or inaccurate personal data;

storage of personal data is carried out in a form, that allows to determine the subject of personal data, no longer than the purposes of personal data processing require, if the period of storage is not established by Federal law or the contract, a party to which, a beneficiary or guarantor the subject of the personal data is;

personal data shall be destroyed or depersonalized once the goal of its processing has been achieved, or if it is no longer necessary to achieve such goals, if not otherwise prescribed by Federal Law.

3.3. The Institution processes personal data for the purpose of:

complying with the Constitution of the Russian Federation, legislative and other regulatory legal acts of the Russian Federation, local regulatory acts of the State Atomic Energy Corporation Rosatom and the Institution;

exercising functions, powers and duties assigned by the legislation of the Russian Federation to the Institution, including the provision of personal data to public authorities, the Pension Fund of the Russian Federation, the Social Insurance Fund of the Russian Federation, the Federal Compulsory Medical Insurance Fund, as well as other state bodies.

regulating labor relations with the Institution's employees (promotion of employment, training and career advancement, personal security, control over the scope and quality of the work done, safekeeping of property);

providing employees and their families with additional guarantees and compensation, including non-state pension benefits, voluntary medical insurance, health care and other social services;

protecting life, health or other vital interests of personal data subjects;

developing, signing, executing and terminating of contracts with counterparties;

arranging access control and internal access mode at the Institution facilities;

formation of reference materials for internal information support of the Institution, production branches and representative offices;

executing judicial acts, acts of other bodies or officials, which are to be executed in accordance with the legislation of the Russian Federation Concerning Enforcement Proceedings;

exercising rights and legitimate interests of the Institution or third parties in the framework of activities, provided by the Charter and other local regulatory acts of the Institution, or achievement of socially significant goals;

other legitimate purposes.

4. List of subjects whose personal data are processed by the Institution

The Institution processes personal data of the following subjects' categories:

employees of the structural units of the Institution;

regional centers employees;

other personal data subjects (to ensure the implementation of the processing purposes, specified in section 5 of the Policy).

5. List of personal data processed by the Institution

5.1. List of personal data processed by the Institution is stipulated in accordance with the legislation of the Russian Federation, local regulatory acts of the State Atomic Energy Corporation Rosatom and the Institution, taking into account the purposes of personal data processing, specified in section 4 of the Policy.

5.2. Special personal data categories, concerning race, nationality, political

commitment, religious or philosophical beliefs and private life are not processed in the Institution.

6. Institutional functions in Personal Data Processing

In the course of personal data processing, the Institution:

- takes relevant measures to ensure compliance with the Russian Federation legislation and local regulatory acts of the Institution in personal data processing;
- establishes legal, organizational and technical measures to protect personal data from unauthorized or inadvertent access, destruction, alteration, blocking, copying, provision, dissemination of personal data, as well as from other illegal actions in relation to personal data;
- appoints the person responsible for the organization of personal data processing in the Institution;
- issues local regulatory acts defining the policy and issues of personal data processing and protection in the Institution;
- provides employees of the Institution and foreign regional centers of the State Atomic Energy Corporation Rosatom (hereinafter referred to as the regional centers), directly involved in personal data processing, with the provisions of the legislation of the Russian Federation, local regulatory acts of the State Atomic Energy Corporation Rosatom and the Institution in personal data, including requirements for personal data protection, and training of these employees;
- publishes or otherwise provides unrestricted access to this Policy;
- informs personal data subjects or their representatives of the availability of personal data, related to the respective subjects, in the prescribed manner, provides the opportunity to get acquainted with this personal data when accessing and (or) receiving requests from specified personal data subjects or their representatives, unless otherwise provided by law of the Russian Federation;
- terminates the processing and destroying personal data as stipulated by the legislation of the Russian Federation for personal data;
- performs other actions stipulated by the legislation of the Russian Federation for personal data.

7. Conditions for Personal Data Processing in the Institution

7.1. Personal data processing in the Institution is carried out with the consent of the personal data subject to processing of his personal data, unless otherwise provided by the legislation of the Russian Federation for personal data;

7.2. The Institution shall not disclose or distribute personal data to third parties without consent of the data subject, unless otherwise is provided by Federal Law.

7.3. The Institution has the right to entrust personal data processing on the basis of a contract concluded with this person. The contract should contain a list of actions (operations) with personal data to be performed by a person processing personal data, processing purposes, the obligation of such person to respect the confidentiality of personal data and ensure the security of personal data in processing, as well as the requirements for protection of the processed personal data in accordance with Article 19 of Federal Law On Personal Data.

7.4. For the purposes of internal information support, the Institution may create

internal reference materials, which provide the subject's surname, name, patronymic, place of work, position, year and place of birth, address, subscriber number, e-mail address, and other personal data provided by the personal data subject with the written consent of the personal data subject, unless otherwise provided by the legislation of the Russian Federation.

7.5. Access to personal data, processed in the Institution, is permitted only to employees of the Institution covered by the list of positions for structural units of the Institution and regional centers, substitution of which is subject to personal data processing.

8. List of actions with personal data and personal data processing procedures

8.1. The Institution carries out collection, recording, systematization, storage, clarification (updating, change), extraction, use, transfer (distribution, granting, access), depersonalization, blocking, deletion and destruction of personal data.

8.2. Personal data processing in the Institution is carried out in the following ways:
 non-automated processing of personal data;
 automated processing of personal data with or without transmission of the received information via information and telecommunication networks;
 combined processing of personal data.

9. Rights of personal data subjects

9.1. Personal data subjects have the right to:
 completing information on their personal data processed in the Institution;
 accessing to their personal data, including the right to receive a copy of any record, containing their personal data, except as provided by Federal law, as well as access to medical data, related to them, with the help of a medical specialist of their choice;
 clarifying, blocking or destroying their personal data in case of personal data are incomplete, outdated, inaccurate, illegally obtained or inessential for processing purpose declared;
 revoking the consent to the personal data processing;
 taking measures provided by law to protect their rights;
 appealing against the action or inaction of the Institution carried out in violation of the requirements of the legislation of the Russian Federation for personal data, in an authorized body for protection of the rights of personal data subjects or in court;
 exercising other rights provided by the legislation of the Russian Federation.

10. The Institution actions to ensure fulfillment of a processor's obligations during personal data processing.

10.1 Relevant measures to ensure that the Institution fulfills a Processor's obligations, provided by the legislation of the Russian Federation for personal data include:

appointment of a person responsible for the organization of personal data processing in the Institution;
 adoption of regulatory acts and other documents in the field of processing and protection of personal data;
 organization of training and methodological work with employees of structural

units of the Institution and regional centers, holding the positions included in the list of positions of the Institution structural units and regional centers, replacement of which is the processing of personal data;

obtaining the consent of the personal data processing subjects, except as provided by the legislation of the Russian Federation;

separation of personal data processed without the use of automation, from other information, in particular by recording them on separate material media of personal data in special sections;

provision of separate storage of personal data and material carriers, which are processed for different purposes and which contain different categories of personal data;

imposing a ban on transfer of personal data through open communication channels, computer networks outside the controlled zone, Corporate Data Transfer Networks of the State Atomic Energy Corporation Rosatom and the Internet without applying the measures for ensuring security of personal data (except publicly available and / or depersonalized personal data);

storage of personal data material carriers in compliance with conditions ensuring safety of personal data and excluding its unauthorized access;

implementation of internal control over compliance of personal data processing with Federal Law On Personal Data and the regulatory legal acts adopted in accordance with it, the requirements for protection of personal data, this Policy, local regulatory acts of the Institution;

other measures stipulated by the legislation of the Russian Federation for personal data.

10.2. Measures providing personal data protection while processing in personal data information systems are established in accordance with industry requirements for information security and the use of information security tools for automated systems that process information constituting a trade secret, restricted service information (marked for official use), as well as personal data in the State Atomic Energy Corporation Rosatom and its organizations.

11. Control over compliance with the legislation of the Russian Federation and local regulatory acts of the Institution for personal data, including requirements for the personal data protection

11.1. Control over compliance of structural units of the Institution with the legislation of the Russian Federation and local regulatory acts of the Institution for personal data, including the personal data protection requirements, is aimed at ensuring compliance of personal data processing by structural units of the Institution with the legislation of the Russian Federation and local regulatory acts of the Institution in the field of personal data, including the personal data protection requirements, as well as to measures aimed at prevention and identification of infringements of the Law of the Russian Federation related to personal data, identification of potential channels of leakage and unauthorized access to personal data and the removal of consequences of such infringements.

11.2. Internal control over compliance of the structural units of the Institution administration with the legislation of the Russian Federation and local regulatory acts of the Institution for personal data, including the requirements for the personal data protection, is exercised by the person responsible for the organization of personal data

processing in the Institution.

11.3. Internal control over compliance of personal data processing with Federal Law On Personal Data and relevant statutory acts, the personal data protection requirements, the Institution local regulatory acts is exercised by the Asset Protection and Corporate Security Management of the Institution.

11.4. Personal responsibility for compliance with the requirements of the legislation of the Russian Federation and Institution local regulatory acts for personal data in the structural units of the Institution, as well as for ensuring the confidentiality and security of personal data in the units of the Institution lies with their managers.

12. Regulatory references

1. Labor Code of the Russian Federation.
2. Federal Law of July 27, 2006 No. 152-FL “On Personal Data”
3. Decree of the President of the Russian Federation of March 6, 1997 No. 188 “On Approving the List of Confidential Information”.
4. Decree of the Government of the Russian Federation of September 15, 2008 № 687 «On Approval of the Regulation on Peculiarities of Processing Personal Data Performed Without Using Automation Tools».
5. The Russian Federation Government Resolution No. 512 «On Approving the Requirements to Biometric Personal Data Tangible Carrier and Such Data Storage Beyond Personal Data Information Systems», dated July 6, 2008.
6. The Russian Federation Government Regulation No. 1119 ‘On Approving the Requirements to the Personal Data Protection While Processing in Personal Data Information Systems’, dated November 1, 2012.
7. The Order of FSTEC of Russia No. 21 «On Approving the List and Scope of Planning and Technical Activities for Protection of Personal Data While Processing via Personal Data Information Systems», dated February 18, 2013.
8. The Order of the Russian Federal Service for Supervision in the Sphere of Telecom, Information Technologies and Mass Communications No. 996 «On Approving the Requirements and Methods for Depersonalizing Personal Data», dated September 5, 2013.