

Personal Data Processing Policy of “Netopia” LLC

The document contains the basic approaches to the processing of personal data in "Netopia" LLC .

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1. General provisions

This document (hereinafter - the Policy) defines the goals and general principles of personal data processing, as well as implemented measures of personal data protection in "Netopia" LLC (hereinafter - the Operator). The Policy is a publicly available document of the Operator and provides for possibility of familiarization with it by any person.

The Policy is valid indefinitely after its approval and until it is replaced by a new version.

The Policy uses terms and definitions in accordance with their meanings as defined in FL-152 "On Personal Data".

The Operator's personal data shall be processed in compliance with the principles and conditions stipulated by this Policy and the laws of the Russian Federation in the field of personal data.

2. Personal data collection purposes

Personal data that is redundant or incompatible with the following main purposes will not be processed:

- Conclusion, execution and termination of civil law contracts with individuals, legal entities and other persons, in cases stipulated by the current legislation of the Russian Federation and the Charter of the Operator;

- Providing information of notifying or marketing character, including information about services, current promotions, events (with the client's prior consent to receive such information);
- Carrying out of measures on settlement of applications, claims, messages of clients with regard to quality of service, provision of products, activity of trade channels;
- Regulation of subject's labor (civil-law) relations with Operator (ensuring compliance with laws and other regulatory acts, assistance to employees in employment, training and promotion, ensuring personal safety of employees, control over quantity and quality of work, ensuring security of property)
- Ensuring pass control on the Operator's premises.

3. Legal basis for processing personal data

The operator processes personal data on a lawful and fair basis, based on the following documents:

- constitution of the Russian Federation;
- labor Code of the Russian Federation;
- civil Code of the Russian Federation;
- tax Code of the Russian Federation;
- federal Law No. 152-FL of 27.07.2006 "On Personal Data";
- federal Law dated 06.04.2011 No. 63-FL "On electronic signature";
- federal Law of 04.05.2011 № 99-FL "On licensing certain types of activities";
- federal Law No. 126-FL of 07.07.2003 "On Communications";
- federal Law of 01.04.1996 № 27-FL "On Individual
- on Individual (Personalized) Accounting in the Mandatory Pension Insurance System";
- federal Law № 125-FL dated October 22, 2004 On Archives in the Russian Federation;
- federal Law "On Education in the Russian Federation" of 29.12.2012 N 273-FZ current;
- charter of "Netopia" LLC.

4. Volume and categories of processed personal data, categories of personal data subjects

The content and scope of processed personal data shall be determined in accordance with the purposes of processing. The main categories of personal data subjects whose data is processed by the Operator include:

- individuals in labor and civil law relations with the Operator;
- individuals in labor and civil-law relations with the Operator's counterparties;
- applicants for vacancies;
- physical persons, applying to the Company in order to get consultations with the help of communication means, provided by the Operator.

For individuals in employment and civil law relations with the Operator and candidates for vacant positions can be processed:

- surname, first name, patronymic (including previous surnames, first names and (or) patronymics, if changed);
- year, month, date of birth;
- information on citizenship;
- type, series, number of the identity document, name of the issuing authority, date of issue;
- residence address (address of registration, actual residence);
- marital status;
- contact telephone number or information on other means of communication;
- details of the insurance certificate of state pension insurance;
- taxpayer identification number;
- details of the insurance policy of compulsory health insurance;
- details of the certificate of state registration of acts of civil status;
- information on labor activity;
- information on military registration and details of military registration documents;
- Information on education, including postgraduate professional education (name and year of graduation from the educational institution, name and details of the educational document, qualification, specialty according to the educational document);
- information on the scientific degree;

- information about income;
- other information provided for by the standard forms and established procedure of processing.

For individuals in employment and civil law relations with the Operator's counteragents may be processed:

- surname, first name, patronymic;
- year, month, date of birth;
- information about citizenship;
- Type, series, number of the identity document, name of the issuing authority, date of issue;
- residence address (address of registration, actual residence);
- contact telephone number or information about other means of communication;
- information on labor activity;
- other information provided for by the standard forms and established order of processing.

Individuals who contact the company for consultations by means of communication facilities provided by the Operator may be processed:

- surname, first name, patronymic;
- contact telephone number or other means of communication; other information provided for in the standard forms.

5. Procedure and conditions of personal data processing

The operator processes personal data in a mixed way, i.e. both with and without the use of automation tools.

The following actions are performed with personal data: collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, transfer, provision, access), depersonalization, blocking, deletion, destruction of personal data.

Processing shall ensure the accuracy, adequacy and relevance of personal data in relation to the purposes of its processing. If inaccurate or incomplete personal data is detected, it shall be updated.

The operator shall obtain and process personal data in the cases stipulated by the Federal Law-152 with the written consent of the subject of personal data. Consent in the form of an electronic document signed by a qualified electronic signature shall be deemed equivalent to consent in writing on paper containing the handwritten signature of the subject of personal data.

Consent to the processing of personal data may be given by the personal data subject or his/her representative in any form that allows to confirm the fact of its receipt, unless otherwise stipulated by Federal Law-152.

The operator does not process special categories of personal data related to race, ethnicity, political views, religious or philosophical beliefs, intimate life.

Information that characterizes a person's physiological characteristics and on the basis of which his/her identity can be established (biometric personal data) may be processed only with the consent in writing of the subject of personal data.

Personal data shall be processed and stored no longer than required for the purposes of personal data processing, unless there are legitimate grounds for further processing. Processed personal data shall be destroyed or depersonalized under the following conditions:

- achievement of the purposes of personal data processing or the maximum retention period - within 30 days;
- loss of necessity to achieve the purposes of personal data processing - within 30 days;
- submission by the personal data subject or his/her legal representative of confirmation that the personal data is illegally obtained or is not necessary for the stated purpose of processing - within 7 days;
- inability to ensure the lawfulness of personal data processing - within 10 days;
- withdrawal of personal data subject's consent to processing of personal data, if preservation of personal data is no longer required for the purposes of personal data processing - within 30 days;
- revocation of the personal data subject's consent to the use of personal data for contacts with potential consumers in the promotion of goods and services - within 1 day, after receipt of the relevant request;
- expiration of limitation period for legal relations, in the framework of which the personal data processing is performed or was performed; liquidation (reorganization) of the Operator.

Processing of personal data on the basis of contracts and other agreements of the Operator, the Operator's instructions and orders for processing of personal data shall be carried out in accordance with the terms of these contracts, agreements and orders. The aforementioned documents may specify, in particular:

- goals, conditions, terms of processing of personal data;
- obligations of the parties, including measures to ensure security of personal data;
- rights, duties and responsibilities of the parties regarding the processing of personal data.

In cases not expressly provided for by applicable law or contract, processing shall be carried out after obtaining the consent of the personal data subject. Consent may be expressed in the form of actions, acceptance of the terms of the contract-offer, putting appropriate marks, filling in the fields in the forms, forms, or executed in writing in accordance with the law.

The operator shall take the necessary legal, organizational and technical measures to ensure the security of personal data, their protection from unauthorized (including accidental) access, destruction, modification, blocking access and other unauthorized actions. Such measures include, but are not limited to:

- Appointment of employees responsible for organization of processing and security of personal data;
- Checking availability of the clauses on confidentiality of personal data in the contracts and inclusion, if necessary, in the contracts;
- Issuance of local acts on personal data processing, familiarization of employees with them, and user training;
- Ensuring physical security of premises and means of processing, pass control, security guards, video surveillance;
- Restriction and delimitation of access of employees and other persons to personal data and means of processing, monitoring of actions with personal data
- Determination of threats to security of personal data during its processing, formation of threat models based on these threats;
- Application of security tools (anti-virus tools, firewalls, means of protection against unauthorized access, cryptographic protection of information), including those that passed the procedure of conformity assessment in the prescribed manner;
- accounting and storage of data carriers, excluding their theft, replacement, unauthorized copying and destruction;
- backing up information for the possibility of recovery;
- internal control over compliance with the established procedure, verification of the effectiveness of the measures taken, response to incidents.

6. Personal data subjects' rights

The subject of personal data has the right to withdraw consent to the processing of personal data by sending a corresponding request to the Operator by mail or by contacting in person.

The subject of personal data has the right to receive information concerning the processing of his/her personal data, including information containing:

- confirmation of the fact of processing of personal data by the Operator;
- the legal basis and purpose of personal data processing;
- purposes and methods of personal data processing used by the Operator;
- name and location of the Operator, information on persons (except for employees/employees of the Operator) who have access to personal data or to whom personal data may be disclosed on the basis of a contract with the Operator or on the basis of federal law;
- processed personal data pertaining to the respective personal data subject, the source of its receipt, unless other procedure for presentation of such data is provided by federal law;
- the terms of processing of personal data, including the period of their storage;
- the procedure of exercising by the subject of personal data of his/her rights provided by the Federal Law "On Personal Data";
- information about performed or expected cross-border transfer of data;

- name or surname, first name, patronymic and address of the person processing personal data by order of the Operator, if processing is or will be assigned to such person;
- other information required by the Federal Law "On Personal Data" or other federal laws.

The subject of personal data has the right to require the operator to clarify his personal data, block or destroy it if the personal data is incomplete, outdated, inaccurate, illegally obtained or is not necessary for the stated purpose of processing, as well as to take statutory measures to protect his rights.

If the subject of personal data believes that the operator is processing his personal data in violation of the requirements of the Federal Law "On Personal Data" or otherwise violates his rights and freedoms, the subject of personal data has the right to appeal the actions or inaction of the operator to the authority to protect the rights of subjects of personal data (the Federal Service for Supervision of Communications, Information Technology and Mass Communications - Roskomnadzor) or in court.

The subject of personal data has the right to protect their rights and legitimate interests, including compensation for losses and (or) compensation for moral harm in court.

7. Operator's rights and obligations

The Operator's rights and obligations are defined by applicable laws and the Operator's agreements.

Compliance with this Policy shall be monitored by the person responsible for organizing the processing of personal data and the Operator's Information Security Department within the scope of their authority.

Liability of persons involved in processing personal data on the basis of the Operator's instructions, for unlawful use of personal data shall be established in accordance with the terms of the civil contract or the Confidentiality of Information Agreement concluded between the Operator and the counterparty.

Persons guilty of violating the rules governing the processing and protection of personal data shall bear material, disciplinary, administrative, civil or criminal liability in the manner prescribed by federal laws, local acts, agreements of the Operator.

The Personal Data Processing Policy shall be developed by the person responsible for organizing personal data processing and put into effect upon approval by the Operator's Head. Proposals and comments for changes in the Policy should be sent to info@netopia.pro. The Policy shall be reviewed annually to keep it up to date and shall be updated as necessary.