

LLC "FAMILY" POLICY ON PROCESSING OF PERSONAL DATA

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TERMS AND DEFINITIONS

Automated processing of personal data - processing personal data by means of computer technology.

Blocking of personal data - temporary termination of processing personal data (Except when the processing is necessary to clarification of personal data)

Personal data information system - a set of databases of personal data, information technologies and technical means providing their processing.

De-identification of personal data - actions, as a result of which it is impossible to determine the ownership without the use of additional information personal data to a specific subject of personal data.

Processing of personal data - Any action (operation) or set of actions (operations) performed with or without the use of automatic means with personal data, including the collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, transfer (distribution, provision, access), anonymization, blocking, removal, destruction of personal data.

Operator - a state body, municipal authority, legal entity or individual, independently or together with other persons organizing and (or) carrying out processing of personal data, as well as defining the purpose of personal data processing, the composition of personal data to be processed, actions (operations) performed with personal data.

Personal data - any information relating to a directly or indirectly identified or identifiable individual (personal data subject).

Providing personal data - actions aimed at disclosure of personal data to a certain person or a certain circle of people.

Dissemination of personal data - actions aimed at disclosure of personal data to an indefinite range of persons (transfer of personal data) or to familiarize with personal data to an unlimited range of persons, including the publication of personal data in the media, placing in information and telecommunications networks or providing access to personal data in any other way.

Cross-border transfer of personal data - transfer of personal data to a foreign country to a foreign authority, a foreign individual or a foreign legal entity.

Destruction of personal data - actions resulting in the inability to restore the content of personal data in the information system of personal data and (or) as a result of which the material media of personal data is destroyed.

1. GENERAL PROVISIONS

The present document defines policy of LLC "FAMILY" (hereinafter - the Operator) concerning processing of personal data and discloses information about realized measures on providing security of personal data at the Operator to protect rights and freedoms of the person and the citizen at processing of their personal data, including protection of rights to privacy, personal and family secrets.

This document "Policy of FAMILY LLC regarding the processing of personal data" (hereinafter - Policy) is developed in accordance with the Constitution of the Russian Federation, Federal Law № 160-FL "On ratification of the Council of Europe Convention for the Protection of Individuals with regard to Automatic Processing of Personal Data", the Labor Code of the Russian Federation № 197-FL, Federal Law № 152-FL "On Personal Data" (hereinafter - FL-152), other federal laws and by-laws of the Russian Federation that define the cases and features of processing

Provisions of this Policy shall be binding on all employees of the Operator processing personal data, including those working in the Operator's branches and separate subdivisions. Provisions of this Policy are the basis for organization of work on processing of personal data at the Operator, including development of internal regulatory documents regulating processing and protection of personal data at the Operator.

In the event that certain provisions of this Policy conflict with applicable personal data laws, the provisions of applicable laws shall apply.

Requests of subjects of personal data regarding processing of their personal data by the Operator shall be accepted at the addresses: 105005, Moscow, Baumanskaya Street, 11, Building 8, E.2, Premise 1, Room. 7,8.

Personal data subjects may also send their request, signed with an enhanced qualified electronic signature, to the e-mail address pt@familyagency.ru.

The time limit for processing requests does not exceed 30 (thirty) days from the date of the request.

This Policy is a document to which unrestricted access is provided. In order to ensure unrestricted access, the Policy is published on the official websites of the Operator at: <https://creative.family/>.

2. PRINCIPLES AND CONDITIONS FOR THE PERSONAL DATA PROCESSING

2.1. PRINCIPLES OF PERSONAL DATA PROCESSING

The operator's processing of personal data is based on the following principles:

- Legality and fair basis;
- Restriction of personal data processing to the achievement of specific, predetermined defined and legitimate purposes;

- Preventing the processing of personal data that is incompatible with the purposes of collecting personal data collection;
- Not to combine the databases containing personal data, processing of which is incompatible with the purposes of personal data collection;
- Processing only those personal data that meet the purposes of its processing;
- Compliance of the content and scope of processed personal data with the stated processing purposes;
- Inadmissibility of processing of personal data excessive in relation to the stated objectives of its processing;
- Ensuring accuracy, sufficiency and relevance of personal data in relation to the purposes of personal data processing;
- Destruction or depersonalization of personal data upon attainment of objectives of such data processing or in case of dispossession of such data, if the Operator fails to eliminate violations of such personal data unless otherwise provided by the federal law.

2.2. CONDITIONS OF PERSONAL DATA PROCESSING

The operator processes personal data under at least one of the following conditions of the following conditions:

- Processing of personal data is carried out with the consent of the subject of personal data for processing of their personal data;
- Processing of personal data is necessary to achieve the goals envisaged by an international treaty of the Russian Federation or by law, to perform and fulfill the functions, powers and obligations imposed on the operator by the legislation of the Russian Federation;
- Processing of personal data is necessary for administration of justice, execution of a judicial act, an act of another body or an official to be executed in accordance with the legislation of the Russian Federation on enforcement proceedings;
- Processing of personal data is necessary to perform the contract, which party or beneficiary or guarantor, under which the subject of personal data, as well as for the conclusion of the contract on the initiative of the subject of personal data or the contract, under which the subject of personal data will be a beneficiary or guarantor;
- Processing of personal data is necessary to exercise the rights and legitimate interests of the operator or third parties or to achieve socially important goals, provided that this does not violate the rights and freedoms of the subject of personal data;
- Processing of personal data, access to which is provided to the general public by the subject of personal data or at their request (hereinafter - publicly available personal data);
- Personal data subject to publication or mandatory disclosure in accordance with federal law is processed.

2.3. CONFIDENTIALITY OF PERSONAL DATA

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

2.4. PROCESSING OF PERSONAL DATA ALLOWED BY THE SUBJECT OF PERSONAL DATA FOR DISTRIBUTION

Unrestricted access to personal data is provided by the subject of personal data by giving separate consent to process personal data allowed by the subject for dissemination.

Dissemination consent may include:

- Prohibitions on the transfer (other than granting access) of personal data by the Operator to an unlimited number of persons;
- Prohibitions on processing or conditions of processing (other than granting access) of personal data to an unlimited number of persons;
- Categories and list of personal data, for processing of which the subject establishes conditions and prohibitions.

The operator may not refuse the personal data subject's establishment of such prohibitions and conditions. Within 3 business days of receipt of the subject's consent, the Operator shall publish information about the conditions of processing and the existence of prohibitions and conditions on processing of personal data permitted by the personal data subject for dissemination.

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If the consent does not set prohibitions and conditions of processing, or categories and list of personal data to which the prohibitions and conditions apply - the data are processed by the operator without transferring (distributing, providing, access) and the possibility to take other actions with personal data to the general public.

The operator may obtain consent either directly or using the system of the Federal Service for Supervision of Communications, Information Technology, and Mass Media. Silence or inaction is not considered consent to process such personal data.

If personal data is disclosed to an indefinite number of persons as a result of an offense, crime or force majeure circumstances, the Operator processing such data (including subsequent dissemination) must provide evidence of the lawfulness of such processing. Consent to dissemination of personal data ends when the data subject submits a request to cease such processing.

2.5. SPECIAL CATEGORIES OF PERSONAL DATA

Operator's processing of special categories of personal data related to race, ethnicity, political views, religious or philosophical beliefs, health conditions, intimate life, is allowed in cases, if:

- The subject of personal data has given their consent in writing to the processing of their personal data;
- Personal data is made publicly available by the subject of personal data;
- Processing of personal data is carried out in accordance with the legislation on state social assistance, labor legislation, the legislation of the Russian Federation on state pensions, on labor pensions;
- Processing of personal data is necessary to protect the life, health or other vital interests of the subject of personal data or the life, health or other vital interests of other persons and obtaining the consent of the subject of the subject of personal data is impossible;
- Processing of personal data shall be carried out for medical and preventive purposes, for purposes of establishing a medical diagnosis, providing medical and medical and social services, provided that processing of personal data shall be carried out by a person professionally engaged in medical activities and obliged to maintain medical secrecy in accordance with the laws of the Russian Federation;
- Processing of personal data is necessary to establish or exercise the rights of the personal data subject or third parties, as well as in connection with the administration of justice;
- Processing of personal data is carried out in accordance with the legislation on compulsory types of insurance, with the insurance legislation.

Processing of special categories of personal data carried out in cases specified in clause 4 of Art. 4 of Article 10 of the Federal Law 152 shall be immediately terminated if the reasons for the processing have been eliminated, unless otherwise provided by federal laws.

The Operator may process personal data on criminal records only in cases and in the manner determined in accordance with federal laws.

2.6. BIOMETRIC PERSONAL DATA

Information that characterizes the physiological and biological characteristics of the person, on the basis of which it is possible to establish their identity - biometric personal data - can be processed by the Operator only with the consent of the subject of personal data in writing.

2.7. ENTRUSTING THE PROCESSING OF PERSONAL DATA TO ANOTHER PERSON

The operator has the right to assign processing of personal data to another person with the consent of the personal data subject, unless otherwise provided by federal law, on the basis of a contract concluded with that person. The person processing personal data on behalf of the Operator must comply with the principles and rules of personal data processing stipulated by FL-152 and this Policy.

2.8. PROCESSING OF PERSONAL DATA OF RUSSIAN FEDERATION CITIZENS

The operator shall ensure the collection, recording, systematization, accumulation, storage, clarification (updating, change) and extraction of personal data of citizens of the Russian Federation using databases located in the Russian Federation, with the exception of cases specified in paragraphs. 2, 3, 4, 8 ч. 1 of Article 6 of the Federal Law 152.

2.9. CROSS-BORDER TRANSFER OF PERSONAL DATA

The operator makes sure that the foreign country, to whose territory the transfer of personal data is supposed to take place, provides adequate protection of the rights of personal data subjects, before the start of such a transfer.

The transborder transfer of personal data in foreign countries that do not provide adequate protection of the personal data subjects' rights may be carried out in cases:

- where there is consent in writing from the personal data subject for the cross-border transfer of their personal data;
- where the contract to which the personal data subject is a party is being executed.

3. RIGHTS AND DUTIES

Within the framework of personal data processing, the following rights are defined for the operator and the subjects of personal data.

The subject of personal data has the right:

- To receive information relating to the processing of their personal data in the manner, form and time limits established by personal data legislation;
- To demand clarification of their personal data, their blocking or destruction in case the personal data are incomplete, outdated, unreliable, illegally obtained, are not necessary for the stated purpose of processing or are used for purposes not previously stated when the subject of personal data gave consent to the processing of personal data;
- To take the measures provided by law to protect their rights;
- Withdraw their consent to the processing of personal data;
- Other rights provided by the legislation on personal data

The operator has the right to:

- Process personal data on the subject of personal data in accordance with the stated purpose;
- Demand from the subject of personal data to provide accurate personal data necessary to perform the contract, to identify the subject of personal data, as well as in other cases provided by the legislation on personal data;
- Restrict access of the subject of personal data to their personal data in case access of the subject of personal data to their personal data violates rights and legitimate interests of third parties, as well as in other cases provided by the legislation of the Russian Federation;

- Process publicly available personal data on individuals;
- To process personal data subject to publication or mandatory disclosure in accordance with the laws of the Russian Federation;
- To assign processing of personal data to another person with the consent of the subject of personal data;
- Other rights stipulated by the personal data legislation.

4. ENSURING THE FULFILLMENT OF THE OPERATOR'S DUTIES AND MEASURES TO PROTECT PERSONAL DATA

Security of personal data processed by the Operator is ensured by implementing legal, organizational and technical measures necessary to ensure the requirements of federal legislation in the field of protection of personal data.

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

- Appointment of the person responsible for organizing the processing of personal data;
- Appointment of persons responsible for ensuring security of personal data and elimination of unauthorized access to such data;
- Appointment of a person responsible for ensuring security of personal data in information systems;
- Limitation of the list of persons admitted to the processing of personal data;
- Familiarization of users with requirements of federal legislation and regulatory documents of the Operator on processing and protection of personal data;
- Organization of accounting, storage and circulation of media containing information with personal data;
- Determination of threats to the security of personal data during its processing, the formation of threat models on the basis of these threats;
- Development of the personal data protection system based on the threat model;
- Verification of readiness and efficiency of use of information security tools;
- Delimitation of user access to information resources and software and hardware for information processing;
- Registration and accounting of actions of users of personal data information systems;
- Use of antivirus and recovery tools of personal data protection system;
- Use of firewall, intrusion detection, security analysis and cryptographic protection of information where necessary;
- Arrangement of access control to the Operator's premises, security of premises with technical means of personal data processing.

5. FINAL PROVISIONS

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

Employees of the Operator guilty of violation of norms regulating processing and protection of personal data shall bear material, disciplinary, administrative, civil or criminal liability as set forth by Federal Laws.