

Personal Data Processing Policy Coordination Center for TLD .RU/.PФ

1. GENERAL PROVISIONS

1.1. This document sets forth the policy of the Coordination Center for TLD .RU/.PФ (hereinafter the “Operator”) for processing personal data (hereinafter “Personal Data”) and describes the actions it takes to protect Personal Data.

1.2. The Operator independently engages in Personal Data processing, determines the objectives of Personal Data processing, the scope of Personal Data subject to processing as well as actions (operations) involving Personal Data.

1.3. The Operator shall adhere to the following principles while processing Personal Data:

- processing is conducted within the scope of the law and on an equitable basis;
- processing is limited to achieving specific, pre-determined and legal objectives;
- any processing that is inconsistent with the objectives of collecting Personal Data is prohibited;
- integrating databases containing Personal Data is prohibited if the objectives of Personal Data processing in such databases are inconsistent with each other;
- only Personal Data that is directly related to the objectives of its processing shall be processed.

1.4. The Operator shall develop internal regulations that establish procedures for Personal Data processing and protection.

2. TERMS AND DEFINITIONS

2.1. **Personal Data** means any information related directly or indirectly to an identified or identifiable individual (a personal data subject).

2.2. **(Personal Data) Operator** means the autonomous non-profit organization Coordination Center for TLD .RU/.PФ that, independently or in cooperation with third parties, organizes and/or performs the processing of Personal Data and determines the objectives of Personal Data processing, the scope of the Personal Data subject to processing, and actions (operations) involving the Personal Data.

2.3. **Personal Data Processing** means any action (operation) or a series of actions (operations), using automated tools or otherwise, with Personal Data, including collection, recording, systematization, classification, accumulation, storage, clarification (updates and modifications), retrieval, usage, transfer (dissemination, provision, access), anonymization, blocking, removal and elimination.

2.4. **Personal Data Subject** means an individual to whom the Personal Data

pertains, directly or indirectly.

3. PROCESSING OBJECTIVES

3.1. Statutory provisions for processing Personal Data:

- the Labor Code of the Russian Federation;
- the Civil Code of the Russian Federation No. 51-FZ of November 30, 1994;
- the Tax Code of the Russian Federation No. 146-FZ of July 31, 1998;
- Federal Law No. 167-FZ On Compulsory Retirement Insurance in the Russian Federation of December 15, 2001;
- Federal Law No. 152-FZ On Personal Data of July 27, 2006 (hereinafter referred to as the “Federal Law on Personal Data”);
- Resolution No. 687 of the Government of the Russian Federation Approving the Regulation On Specifics of Non-Automated Personal Data Processing, dated September 15, 2008;
- Resolution No. 1119 of the Government of the Russian Federation Approving the Security Requirements for Personal Data Processed Using Personal Data Filing Systems, dated November 1, 2012;
- Executive Order No. 21 Approving of the Scope of Managerial Procedures and Technical Measures to Protect the Personal Data Processed by Personal Data Filing Systems of the Russian Federal Service for Technical and Export Control, dated February 18, 2013;
- Executive Order No. 966 Approving Personal Data Anonymization Standards and Methods of the Russian Federal Supervision Service for Communications, Information Technology and Mass Media, dated September 5, 2013;
- other statutes and regulations of the Russian Federation, regulatory documents of executive government bodies and the Operator’s internal regulations.

3.2. The Operator may pursue the following objectives in Personal Data Processing:

- to comply with tax, civil and pension laws;
- to comply with Russian labor law (including the organization of business trips, to review CVs/résumés and select job candidates for further employment);
- to perform contractual obligations and/or consider opportunities for further cooperation;
- to respond to various inquiries and verify any provided data in accordance with Russian law and the Operator’s internal regulations;
- to maintain reference and data bases (including telephone directories of employees, contractors and other Personal Data Subjects);
- to organize working groups, conferences, forums and other events that involve collecting information about event participants and their contact data;

– to perform other responsibilities imposed on the Operator by Russian law, Russian statutory regulations and the Operator’s internal regulations.

3.3. To achieve its objectives (including statutory objectives), the Operator processes the Personal Data of individuals who have entered into employment contracts (as employees) with the Operator, their family members (for the purposes of health insurance), former employees and job candidates; the Operator’s customers and contractors (including senior executives of corporate customers or contractors), members of the Operator’s governance bodies, individuals invited by the Operator to participate in working groups, conferences and other Events organized by the Operator, and users visiting the Operator’s websites, including those who submit inquiries on feedback forms. The Operator’s website may collect and process anonymized data on visitors (including cookies and data collected by internet statistics services).

3.4. To achieve the goals of Personal Data Processing, the Operator will perform the following operations with Personal Data: collection, recording, classification, accumulation, storage, clarification (update, modification), retrieval, usage, transfer (provision, access), blocking, removal and destruction.

4. OBTAINING AND PROCESSING PERSONAL DATA

4.1. The Operator obtains Personal Data for processing from the following sources:

- directly from the Personal Data Subject;
- an individual who is not a Personal Data Subject;
- open sources of Personal Data.

4.2. Unless otherwise specified by federal law, a Personal Data Subject can consent to Personal Data processing in any form that allows for the verification of this consent, specifically: in written, oral or other form as specified by applicable law, including through implied consent when using the services on the Operator’s websites, using feedback forms or accepting offers which contain provisions on Personal Data Processing in compliance with applicable law and which are posted on the Operator’s websites.

4.3. The Operator will process Personal Data using both automated tools and otherwise.

4.4. The Operator shall not act in such a manner that will disclose Personal Data to the general public.

4.5. The Operator shall not disclose or provide Personal Data to any third parties without the Personal Data Subject’s written consent. The data may be transferred to third parties in cases specified by Russian law and the Operator’s internal regulations (including, but not limited to, Terms and Conditions of Domain Name Registration in .RU and .PФ) when it is required for participation in the Operator’s events, subject to the Personal Data Subject’s express consent, and in other cases which the Operator informed the Personal Data Subject about through messages and notices on the websites.

4.6. In order to perform the duties, responsibilities and to exercise the authority imposed by Russian law, as well as to achieve the statutory objectives, the Operator will provide parts of the processed Personal Data to the following parties:

- the Pension Fund of the Russian Federation;
- the Social Insurance Fund of the Russian Federation;
- the Federal Tax Service of the Russian Federation;
- Russian law enforcement agencies and judicial bodies (upon request);
- other authorized organizations.

4.7. The Operator will not process sensitive categories of Personal Data related to race, ethnicity, political views, religious or philosophical beliefs, sexual relations, or biometric personal data (except photos and video).

4.8. The Operator may transfer Personal Data outside the country subject to statutory requirements.

4.9. The Operator will not take any action that creates legal consequences for the Personal Data Subject or otherwise affects their rights or legal interests, based exclusively on automated processing of the Personal Data.

4.10. The Operator will not process the Personal Data for the purpose of promoting goods and services in the market by directly contacting potential customers via telemarketing methods.

5. DATA STORAGE

5.1. The Operator will process the Personal Data only for the length of time required for the objectives of Personal Data Processing.

5.2. The Operator will arrange storage of Personal Data for a period of time specified in the Labor Code of the Russian Federation No. 197-FZ dated December 30, 2001, Federal Law No. 402-FZ On Accounting dated December 6, 2011, the Tax Code of the Russian Federation (Part 1: Federal Law No. 146-FZ of July 31, 1998; Part 2: Federal Law No. 117-FZ of August 5, 2000); the Inventory of Standard Managerial Archive Documents Accumulated During the Operation of Government Bodies, Local Government Bodies and Organizations, With Retention Times (Schedule to Russian Ministry of Culture Executive Order No. 558 of August 25, 2010).

5.3. The Operator will destroy the processed Personal Data once the objectives of Personal Data Processing have been achieved, if there is no further need in achieving these objectives and upon expiration of the retention period.

6. DATA PROTECTION

6.1. The Operator shall take the necessary legal, managerial and technical actions to protect processed Personal Data from unlawful or accidental access, destruction, alteration, blocking, copying, disclosure, dissemination and other unlawful operations.

6.2. The Operator shall issue an order assigning an employee to be responsible for organizing Personal Data processing.

6.3. The Operator shall regularly analyze conditions and factors that may threaten the security of Personal Data during processing.

6.4. The Operator's Personal Data protection system is based on data security tools that have undergone due conformity assessment.

6.5. Before activating any new Personal Data filing system, the Operator shall evaluate the efficiency of Personal Data security measures.

6.6. The Operator has implemented the following procedures as part of the Personal Data security system:

- Personal Data access policy;
- assessment of potential damage to Personal Data Subjects;
- detection of unauthorized access to Personal Data;
- overseeing and auditing Personal Data processing activity for compliance with Russian law;
- monitoring Personal Data security measures and security levels.

7. DATA DISCLOSURE

7.1. The Operator has filed a Personal Data Processing Notice with the body in charge of protecting the rights of Personal Data Subjects.

7.2. To ensure unrestricted access to the Operator's personal data processing policy and information on the measures to protect Personal Data, the text of this Policy is available on the Operator's official website at www.cctld.ru.

7.3. The Operator observes the rights of Personal Data Subjects (including their requests to update or remove Personal Data) by fulfilling requests received from individuals via the email provided in the Contacts section of the Operator's official website at <https://cctld.ru/contacts/>.