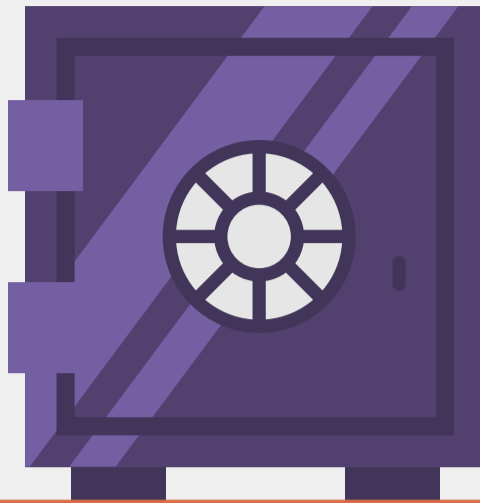


PERSONAL DATA IN RUSSIA

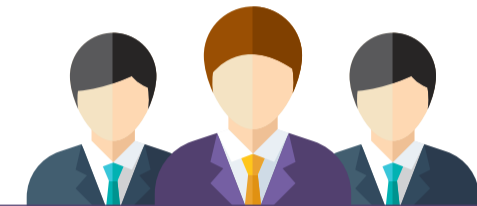
Personal data (PD): any information identifying a citizen of the Russian Federation

Application area: global scale

To-dos: brief rules of processing and preliminary measures



Brief instruction for personal data processing



SHALL ROSKOMNADZOR BE NOTIFIED?

YES:

- Notification shall be sent in paper or electronic form
- Nearly all information from the notification will become publicly available

NO, IF:

- Processing due to an agreement
- PD subject has made his\her PD publicly available
- Processing of the employees' PD
- Other grounds



PD PROCESSING POLICY SHALL BE PUBLISHED

APPROVED

SHALL PD SUBJECT CONSENT TO HIS/HER PD PROCESSING?

YES:

- By default
- In any form if written form is not required
- Written form = electronic form signed by qualified electronic signature

NO, IF:

- For research/statistics with PD depersonalization
- PD subject has made his\her PD publicly available
- Processing due to an agreement with PD subject
- Other grounds

WRITTEN FORM IS REQUIRED

- To transfer to countries which do not provide proper PD protection
- To process biometric data and data on health status
- To process data about race and nationality
- To process data about philosophical and political beliefs
- To processing data about religious beliefs
- To processing data about private life

A WRITTEN FORM OF CONSENT SHALL CONTAIN:

- Information about PD subject
- List of PD to be processed
- Information about operator
- Signature (handwritten/qualified electronic)
- Methods of processing and ways to waive the consent
- Purpose of processing
- Terms of processing



PD PROCESSING

STORAGE

Ensure confidentiality

PD shall be stored in Russia

Technical measures of PD protection shall be taken

Organizational measures of PD protection shall be taken

CROSS-BORDER TRANSFER

Consent of PD subject shall be obtained if PD is transferred to:

Member States of the Council of Europe – consent in any form is enough

Countries providing adequate protection of PD – consent in any form is enough

States that do not provide adequate protection of DP – written consent is necessary.

Exceptions:

- agreement between operator and PD subject
- other cases

ASSIGNMENT OF PERSONAL DATA PROCESSING

Consent of a PD subject is required

Assignment shall be executed by signing an agreement specifying:

- Purposes of processing
- Methods of processing
- Obligations concerning PD confidentiality and safety
- Methods of PD protection

Operator is responsible to a PD subject

NECESSARY TO TAKE INTO ACCOUNT

ADMINISTRATIVE PENALTIES

PD protection policy shall be publicly available (including on the operator's website if the PD is received via Internet)

Individuals
700 – 1 500 roubles

Public officials or corporate officers
3 000 – 6 000 roubles

Sole entrepreneurs
5 000 – 10 000 roubles

Legal entities
15 000 – 30 000 roubles

PD processing shall be performed exclusively for the stated purposes

1 000 – 3 000 roubles

5 000 – 10 000 roubles

-

30 000 – 50 000 roubles

Consent to processing of PD shall be properly obtained

3 000 – 5 000 roubles

10 000 – 20 000 roubles

-

15 000 – 75 000 roubles

Operator shall provide information about PD processing to PD subject upon his/her request

1 000 – 2 000 roubles

4 000 – 6 000 roubles

10 000 – 15 000 roubles

20 000 – 40 000 roubles

Operator shall delete or block inaccurate/outdated/illegally obtained PD

1 000 – 2 000 roubles

4 000 – 10 000 roubles

10 000 – 20 000 roubles

25 000 – 45 000 roubles

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