

APPROVED BY

Rosatom Technical Academy (full legal name in Russian: Автономная некоммерческая организация дополнительного профессионального образования «Техническая академия Росатома»)

from 14.11.2023 No 268/01/3838-P

REGULATION

ON PERSONAL DATA PROTECTION DURING PROCESSING

PL 015-2023

revision 2

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1. Purpose and scope

- 1.1. The Regulation on ensuring the protection of personal data when processing them at Rosatom Technical Academy defines the main principles, goals, conditions and methods of personal data processing, the lists of subjects and personal data processed at the Academy and its branches, the functions of the Academy in the processing of personal data, the rights of personal data subjects, as well as the requirements for the protection of personal data implemented in the Academy and its branches.
- 1.2. The personal data of the Academy employees is processed in the manner and taking into account the requirements set out in PL-005 "Regulations on working with personal data" in the part that does not contradict this Regulation.
- 1.3. The Regulation was developed taking into account the requirements of the Constitution of the Russian Federation, legislative and other regulatory legal acts of the Russian Federation in the field of personal data, as well as the requirements of Regulation of the European Parliament and of the Council of the European Union No. 2016/679 of April 27, 2016. Protection of natural persons in the processing of personal data and the free movement of such data, as well as repealing Directive 95/46/EC (General Data Protection Regulation / GDPR).
- 1.4. This Regulation should be communicated to each employee of the Academy and its branches, and to employees processing personal data, the Regulation should be brought under signature.
- 1.5. All changes and additions to this Regulation are approved by the Rector of the Academy and are introduced by order of the Academy.

2. Terms and abbreviations

- 2.1. The following terms are used herein, with appropriate definitions:

Automated processing of personal data	processing of personal data using computer equipment
Rosatom Technical Academy (the Academy)	full legal name in Russian: Автономная некоммерческая организация дополнительного профессионального образования «Техническая академия Росатома»
Blocking of personal data	temporary termination of personal data processing (unless the processing is necessary to clarify personal data)
Another subject of personal data	a natural person who is not a student (listener) with the Academy in labor relations
Information system personal data (ISpersonal data)	a set of personal data contained in databases and information technologies and technical means providing their processing
Information	Information (messages, data) regardless of the form of their presentation

Controller (according to the EU GDPR)	any natural or legal person, public authority, institution or other body that, alone or in conjunction with others, determines the purposes and means of processing personal data; the controller or the criteria for determining it may be established by Union or Member State law where the purposes and means of such processing are determined by Union or Member State law.
Unauthorized access	access to personal data or actions with personal data carried out in violation of the established rules for access to personal data or actions with them using the regular means of the information system or means similar to them in their functional purpose and technical characteristics
Depersonalization of personal data	actions, as a result of which it becomes impossible to determine the affiliation of personal data to a specific subject of personal data without the use of additional information
Personal data processing	any action (operation) or set of actions (operations) performed with or without the use of such means with personal data, including collection, recording, systematization, accumulation, storage, clarification (update, change), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data
A trainee (listener)	an individual receiving additional professional education in the form of advanced training / professional retraining at Rosatom Technical Academy, as well as individuals undergoing training as personnel of foreign nuclear power plants
Controller	state body, municipal body, legal or natural person, independently or together with other persons organizing and (or) carrying out processing of personal data, as well as determining the purposes of personal data processing, composition of personal data to be processed, actions (operations) performed with personal data
personal data	any information relating directly or indirectly to a defined or defined natural person (personal data

	subject)
personal data allowed by the subject of personal data for the dissemination	the dissemination of personal data, access to which is provided by the subject of personal data by giving consent to the processing of personal data allowed by the subject of personal data for distribution in the manner prescribed by the current legislation of the Russian Federation
Regulations	ensuring the protection of personal data in the implementation of their processing
Provision of personal data	actions aimed at disclosing personal data to a certain person or a certain circle of persons
Processor (according to the EU GDPR Regulation)	a natural or legal person, public authority, institution or other body that processes personal data on behalf of and on behalf of the controller
An employee	an individual who entered into an employment relationship (who concluded an employment contract) with the Rosatom Technical Academy
Personal data employee	employee of Rosatom Technical Academy, participating in the processing of personal data according to job description
Dissemination of personal data	actions aimed at disclosing personal data to an indefinite circle of persons. Silence or inaction of the subject of personal data under no circumstances can be considered consent to the processing of personal data authorized by the subject of personal data for distribution
Personal data subject	a natural person who is directly or indirectly identified or determined using personal data
Cross-border transfer of personal data	transfer of personal data to the territory of a foreign state to the authority of a foreign state, a foreign individual or a foreign legal entity
Destruction of personal data	actions, as a result of which it becomes impossible to restore the content of personal data in the personal data information system and (or) as a result of which material carriers of personal data are destroyed

Destruction of personal data	actions, as a result of which it becomes impossible to restore the content of personal data in the personal data information system and (or) as a result of which material carriers of personal data are destroyed
Authorized body for the protection of the rights of personal data subjects	Federal Service for Supervision in the Sphere of Communications, Information Technologies and Mass Communications (Roskomnadzor)

2.2. The following abbreviations (signatures) are used in this document with the corresponding transcripts:

- ARM Automated Workplace
- LNA Local Regulations
- Regulation (GDPR) No 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons in the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation /GDPR)
- FZ-152 Federal Law of July 27, 2006 No. 152-FZ “On Personal Data”
- FIS FRDO Federal information system "Federal register of information about documents on education and (or) on qualification, documents on training"

3. Purposes and principles of personal data processing

3.1. The Academy, processing personal data of the Academy employees and other personal data subjects who are not with the Academy in labor relations (students (listeners), other individuals), is the Personal Data Controller (in accordance with FZ-152), as well as the Controller (in accordance with the EU Regulation (GDPR)).

3.2. The processing of personal data in the Academy is carried out taking into account the need to ensure the protection of the rights and freedoms of employees, students (listeners) and other personal data subjects, including the protection of the right to privacy, personal and family secrets, on the basis of the following principles:

- personal data processing is carried out in the Academy on a legal and fair basis;
- the processing of personal data is limited to the achievement of specific, predetermined and legitimate purposes;
- personal data processing incompatible with the purposes of personal data collection is not allowed;
- it is not allowed to combine databases containing personal data, the processing of which is carried out for purposes incompatible with each other;
- only personal data that meet the purposes of their processing are subject to processing;

- the content and volume of personal data processed corresponds to the declared purposes of processing;
- redundancy of the processed personal data in relation to the declared purposes of their processing is not allowed;
- personal data processing ensures the accuracy of personal data, their sufficiency and, where necessary, their relevance in relation to the purposes of personal data processing;
- the Academy takes the necessary measures or ensures 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 Personal Data Subject, no longer than the purposes of personal data processing require, unless the storage period of personal data is established by federal law, the contract to which the Personal Data Subject is a party;
- personal data processed are destroyed or anonymized upon achievement of the purposes of processing or in case of loss of the need to achieve these goals, unless otherwise provided by FZ-152.

3.3 Personal data is processed at the Academy for the purposes of:

- ensuring compliance with the Constitution of the Russian Federation, legislative and other normative legal acts of the Russian Federation, LNA Academy;
- implementation of the functions, powers and duties assigned by the legislation of the Russian Federation to the Academy, 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;
- regulation of labor relations with employees of the Academy (assistance in employment, training and promotion, ensuring personal safety, control of the quantity and quality of work performed, ensuring the safety of property);
- provision of additional guarantees and compensations to employees of the Academy and members of their families, including voluntary medical insurance, medical care and other types of social security;
- protection of life, health or other vital interests of personal data subjects;
- preparation, conclusion, execution and termination of contracts with counterparties and other persons in cases provided for by the current legislation and the Charter of the Academy;
- provision of throughput and intra-object modes at the facilities of the Academy;
- formation of reference materials for internal information support of the activities of the Academy, its branches;
- execution of judicial acts, acts of other bodies or officials subject to execution in accordance with the legislation of the Russian Federation on enforcement proceedings;

- exercise of the rights and legitimate interests of the Academy within the framework of the activities provided for by the Charter and other LNA of the Academy, or third parties, or the achievement of socially significant goals;
- provision of educational services, including the provision of information about documents on education and (or) qualifications, documents on training in the FIS FRDO;
- for other lawful purposes.

4. List of subjects whose personal data is processed at the Academy

4.1. The Academy processes personal data of the following categories of subjects:

- employees of the Academy and its branches;
- trainees (listeners);
- other personal data subjects.

5. List of personal data processed at the Academy

- 5.1. The list of personal data of employees, students (listeners) and other personal data subjects processed at the Academy is determined in accordance with the legislation of the Russian Federation, the EU Regulation (GDPR) and the Academy LNA, taking into account the purposes of personal data processing specified in Section 3 of the Regulations.
- 5.2. The processing of special categories of personal data relating to race, nationality, political views, religious or philosophical beliefs, intimate life is not allowed in the Academy.
- 5.3. Processing of biometric personal data information that characterizes the physiological and biological characteristics of a person, on the basis of which it is possible to establish his identity, is allowed at the Academy only with the consent in writing of the Subject of personal data (Appendix No. 4), except for cases provided for by the legislation of the Russian Federation.
- 5.4. The processing of personal data allowed by the Subject for distribution is carried out in the Academy on the basis of the consent of the Subject of personal data for distribution (Appendix No. 5) in compliance with the prohibitions and conditions for the processing of personal data established by the Subject of personal data.

6. Functions of the Academy in the implementation of personal data processing

6.1. Academy in the implementation of personal data processing:

- takes measures necessary and sufficient to ensure compliance with the requirements of the legislation of the Russian Federation, the EU Regulation (GDPR) and the Academy's LNA in the field of personal data;
- takes legal, organizational and technical measures to protect personal data from illegal or accidental access to them, destruction, modification, blocking, copying, provision, distribution of personal data, as well as from other illegal actions in relation to personal data;
- appoints by order of the Academy a person responsible for the organization of protection of personal data in the process of their processing in the Academy, which ensures:

- organization and implementation of internal control over compliance by structural divisions of the Academy of legislation of the Russian Federation and LNA Academy in the field of personal data, including requirements for the protection of personal data;
- organization of reception and processing of appeals and requests of personal data subjects or their representatives and implementation of control over reception and processing of such appeals and requests in the Academy;
- taking the necessary measures to eliminate the causes and consequences of the revealed facts of violation of the requirements of the legislation and LNA of the Academy in the field of personal data and restoration of the violated rights of personal data subjects.

The person responsible for organizing the protection of personal data in the process of their processing in the Academy has the right to involve the Academy employees in the implementation of measures aimed at the safe processing of personal data.

7. The procedure and conditions for processing personal data in the Academy and their cross-border transfer.

- 7.1. The Controller before the start of personal data processing in accordance with Part 1 of Art. 22 FZ-152 is obliged to notify the authorized body for the protection of personal data subjects' rights (Roskomnadzor) of its intention to process personal data. The notification is sent in the form of a document on paper or in the form of an electronic document and signed by the authorized person. The notification must contain information, the list of which is specified in part 3 of Article 22 of the Federal Law-152.
- 7.2. The Controller has the right to carry out personal data processing without notification to the authorized body for the protection of the rights of the Subjects:
 1. included in the state information systems of personal data created for the purpose of protection of security of the state and public order;
 2. if the Controller carries out personal data processing activities exclusively without the use of automation tools;
 3. processed in cases provided for by the legislation of the Russian Federation on transport security, in order to ensure the sustainable and safe functioning of the transport complex, protect the interests of the individual, society and the state in the field of transport complex from acts of illegal interference.
- 7.3. The processing of personal data by the Academy as the Controller is carried out with the consent of the Personal Data Subject in writing, unless otherwise provided by the legislation of the Russian Federation in the field of personal data.
- 7.4. Consent to the processing of personal data may be given by the Personal Data Subject or his representative in any form that allows confirming the fact of its receipt, unless otherwise provided by federal law.
- 7.5. Consent in writing on paper shall be deemed equivalent to the personal data subject's handwritten signature in the form of an electronic document signed in accordance with federal law by an electronic signature.
- 7.6. In case of obtaining consent to the processing of personal data from a representative of the Subject personal data, the authority of this representative to give consent on behalf of the Subject personal data is checked by the Controller Academy.
- 7.7. If the provision of personal data is mandatory in accordance with federal law, and the Personal Data Subject refuses to provide them, then the Controller is obliged to explain to the Personal Data Subject the legal consequences of refusing to provide his personal data and (or) consent

to their processing with the mandatory completion of the Personal Data Subject of the corresponding Form, according to appendix (Appendix No. 6).

7.8. Consent in writing of the Subject personal data to the processing of his personal data must be filled in by him personally and include the information provided for in part 4 of article 9 of FZ-152, and can be sent by the Subject personal data to the Academy in any form or in the form of the relevant annexes (Appendix No. 1, Appendix No. 2, Appendix No. 3) to this Provision.

7.9. When processing personal data of the Controller's employees, the Consent forms contained in PL-005 "Regulations on the processing and protection of personal data of Rosatom Technical Academy employees" are used.

7.10. Cases where consent to the processing of personal data from the Personal Data Subject is not required:

- personal data processing is necessary to achieve the goals stipulated by an international treaty of the Russian Federation or by law, to implement and perform the functions, powers and duties assigned to the Academy by the legislation of the Russian Federation;
- personal data processing is carried out in connection with the participation of a person in constitutional, civil, administrative, criminal proceedings, judicial proceedings in arbitration courts;
- personal data processing is necessary for the execution of a judicial act, an act of another body or official, subject to execution in accordance with the legislation of the Russian Federation on enforcement proceedings;
- personal data processing is necessary for the execution of the powers of federal executive authorities, state extra-budgetary funds, executive bodies of state power of the Subjects of the Russian Federation, local self-government bodies and the functions of organizations involved in the provision of state and municipal services, respectively, provided for by the Federal Law of July 27, 2010 No. 210-FZ "On the organization of the provision of state and municipal services", including registration of the Subject of personal data on a single portal of state and municipal services and (or) regional portals of state and municipal services;
- personal data processing is necessary for the performance of a contract to which the beneficiary or guarantor is the Personal Data Subject, as well as for the conclusion of a contract on the initiative of the Personal Data Subject or a contract under which the Personal Data Subject will be a beneficiary or guarantor. The contract concluded with the Personal Data Subject may not contain provisions restricting the rights and freedoms of the Personal Data Subject, establishing cases of processing personal data of minors, unless otherwise provided for by the legislation of the Russian Federation, as well as provisions allowing for the inaction of the Personal Data Subject as a condition for concluding the contract;
- the processing of personal data is necessary to protect the life, health or other vital interests of the Personal Data Subject, if it is impossible to obtain the consent of the Personal Data Subject;
- processing of personal data is necessary for the exercise of the rights and legitimate interests of the Controller or third parties, including in cases provided for by the Federal Law of 03.07.2016 No. 230-FZ "On Protection of the Rights and Legal Interests of Individuals in the Implementation of Activities for the Return of Overdue Debt and on Amendments to the Federal Law "On Microfinance Activities and Microfinance Organizations", or to achieve

socially significant goals, provided that the rights and freedoms of the Personal Data Subject are not violated;

- personal data processing is carried out for statistical or other research purposes, except for the purpose of promoting goods, works, services on the market, as well as for the purpose of political agitation, subject to mandatory depersonalization of personal data;
- personal data processing is necessary for the professional activities of the journalist and (or) the legitimate activities of the media or scientific, literary or other creative activities, provided that the rights and legitimate interests of the Personal Data Subject are not violated;
- personal data subject to publication or mandatory disclosure in accordance with federal law is processed;
- personal data of subjects who are employees of the Academy members of the Trade Union is processed in the case of processing of personal data of such subjects by the Trade Union of the Academy, and the Trade Union is obliged to process such personal data in compliance with the principle of goal-setting established by Art. 5 FZ-152, as well as in compliance with the procedure and conditions stipulated by the Federal Law of 12.01.1996 No. 10-FZ "On Trade Unions, Their Rights and Guarantees of Activities".

7.11. The processing of personal data contained in appeals (applications) of citizens (subjects of personal data), including the documents attached to them, received directly from citizens or sent by a state body, local government body or other legal entity for consideration on the merits, is carried out without the consent of these personal data subjects in accordance with Article 6 of the Federal Law-152. Is not disclosure of the information contained in the appeal, sending a written appeal to the state body, local government or official, to the branch of the Academy or the Academy, other legal entity, the competence of which includes the solution of the issues raised in the appeal, with the notification of the citizen who sent the appeal, the structural subdivision of the Academy, which made the decision on the forwarding.

7.12. For the purposes of internal information support, the Academy may create directories, address books and other sources in which, with the written consent of the Subject, personal data, unless otherwise provided by the legislation of the Russian Federation, may be included in his personal data.

7.13. The Academy without the consent of the Subject does not disclose personal data to third parties and does not distribute personal data, unless otherwise provided by FZ-152. For these purposes, it is necessary to obtain the consent of the Subject of personal data to distribute his personal data (Appendix No. 6).

7.14. It is not allowed to transfer personal data of the Subject for commercial purposes without his written consent.

7.15. The transfer or exchange of personal data between industry organizations should be carried out only through secure communication channels using the ViPNet-Greenat "Business Mail" or EOSDA. For the recording, processing, storage and transfer of personal data between departments of the Academy, recorded machine media optical disks (CD / DVD) can be used.

7.16. The Academy has the right to entrust the processing of personal data within the framework of the concluded Agreement to another person on the basis of the Confidentiality Agreement concluded with this person, contained in the annex (Appendix No. 7). In the event that the Controller entrusts the processing of personal data to another person, the Controller is responsible to the Personal Data Subject for the actions of this person. The person processing personal data on behalf of the Controller is responsible to the Controller. The person

processing personal data on behalf of the Controller is not obliged to obtain the consent of the Personal Data Subject to process his personal data.

- 7.17. In the event that the Controller entrusts the processing of personal data to a foreign individual or a foreign legal entity, the Controller and the person processing personal data on behalf of the Controller shall be liable to the Personal Data Subject for the actions of these persons.
- 7.18. In the event that documents containing personal data are attached to a letter or request (created and processed in the Academy or its affiliates), such letters or requests shall include the following phrase: Due to the fact that the transferred documents (information, information) contain personal data, they can be used only for the purposes for which they were transferred, in compliance with the requirements of 152-FZ and other regulatory legal acts of the Russian Federation in the field of personal data.
- 7.19. In the event that the Agreement provides for the exchange and (or) transfer of personal data, the text of the Agreement includes the phrases specified in the Recommendations on the content of the Agreement in the case of transfer of personal data, in accordance with the annex (Appendix No. 8).
- 7.20. In case of further changes in the information specified in the Notice (paragraph 7.1 of the Regulations), the Controller shall notify the authorized body for the protection of personal data subjects of all changes that occurred during the specified period not later than the 15th day of the month following the month in which such changes occurred. In case of termination of personal data processing, the Controller shall notify the authorized body for the protection of personal data subjects' rights within ten working days from the date of termination of personal data processing.
- 7.21. Cross-border transfer of personal data is carried out in accordance with FZ-152 and international treaties of the Russian Federation on the basis of personal data subjects' consent for cross-border transfer of their personal data (Appendix No. 9).
- 7.22. Personal data processing of personal data subjects located in the territory of the Member States of the European Union is carried out in the manner prescribed by the provisions of the EU Regulation (GDPR), in cases where the territorial validity criteria of the EU Regulation (GDPR) apply to the activities of the Academy and its affiliates for the processing of personal data.
- 7.23. The authorized body for the protection of the rights of personal data subjects approves the list of foreign states that provide adequate protection of the rights of personal data subjects.
- 7.24. The list of foreign states that provide adequate protection of the rights of personal data subjects includes states that are parties to the Council of Europe Convention on the Protection of Individuals in Automated Processing of Personal Data, as well as foreign states that are not parties to the Council of Europe Convention on the Protection of Individuals in Automated Processing of Personal Data, subject to compliance with the Convention on the Protection of Individuals in Automated Processing of Personal Data. the provisions of this Convention in force in the relevant state of law and the measures applied to ensure the confidentiality and security of personal data during their processing.
- 7.25. The Controller, prior to the commencement of activities on cross-border transfer of personal data, shall be obliged to notify the authorized body for the protection of the rights of personal data subjects of its intention to carry out cross-border transfer of personal data.
- 7.26. This notification (Annex No. 10) is sent separately from the notification of the intention to process personal data specified in paragraph 7.1 of the Regulations.
- 7.27. The notification specified in paragraph 7.24 of the Regulations of this Article shall be sent in the form of a document on paper or in the form of an electronic document and shall be signed by an authorized person.

- 7.28. The Controller, before submitting a notification of its intention to carry out cross-border transfer of personal data, is obliged to receive from the authorities of a foreign state, foreign individuals, foreign legal entities to which the cross-border transfer of personal data is planned, the following information:
1. information on the measures taken by the authorities of a foreign state, foreign individuals, foreign legal entities to whom the cross-border transfer of personal data is planned, measures to protect the personal data transferred and the conditions for the termination of their processing;
 2. information on the legal regulation in the field of personal data of a foreign state under whose jurisdiction are the authorities of a foreign state, foreign individuals, foreign legal entities, which are planning to cross-border transfer of personal data (in the event that cross-border transfer of personal data to authorities of a foreign state, a foreign state is expected to be carried out); natural persons, foreign legal entities under the jurisdiction of a foreign state that is not a party to the Council of Europe Convention on the Protection of Individuals in Automated Processing of Personal Data and is not included in the list of foreign states that provide adequate protection of the rights of personal data subjects;
 3. information about the authorities of a foreign state, foreign individuals, foreign legal entities to whom the cross-border transfer of personal data is planned (name or surname, first name and patronymic, as well as contact phone numbers, postal addresses and e-mail addresses).
- 7.29. The decision to prohibit or restrict the cross-border transfer of personal data in order to protect morality, health, rights and legitimate interests of citizens shall be taken by the authorized body for the protection of the rights of personal data subjects within 10 (ten) working days from the date of receipt of the notification, in the manner prescribed by the Government of the Russian Federation.
- 7.30. After sending the notification specified in paragraph 7.24 of the Regulations, the Controller has the right to carry out cross-border transfer of personal data on the territory of the foreign states specified in such notification, which are parties to the Council of Europe Convention on the Protection of Individuals in Automated Processing of Personal Data or included in the list of foreign states that provide adequate protection of the rights of the Subjects. personal data (hereinafter the List of foreign states), before the decision is made by the authorized body for the protection of the rights of subjects
- 7.31. After sending the notification specified in paragraph 7.24 of the Regulations, the Controller, before the expiration of the terms specified in paragraph 7.28 of the Regulations, shall not have the right to carry out cross-border transfer of personal data in the territory of foreign states specified in the notification that are not parties to the Council of Europe Convention on the Protection of Individuals in Automated Processing of Personal Data and not included in the List of Foreign States, unless such cross-border transfer of personal data is necessary to protect the life, health, other vital interests of the Personal Data Subject or other persons.
- 7.32. In case of adoption by the authorized body for protection of personal data subjects of the decision on prohibition or on restriction of cross-border transfer of personal data, the Controller shall ensure destruction by the authority of a foreign state, a foreign individual, a foreign legal entity of previously transferred personal data.

8. Access to personal data processed at the Academy

- 8.1. Admission of Academy employees to the processing of personal data is carried out on the basis of an order on appointment to a position, when replacing which, according to job descriptions, personal data is processed.

8.2. Employees of the Academy have access to the processing of personal data for the performance of their official (labor) duties, after performing the following activities:

- familiarization with this Regulation, the governing documents of the Academy and the normative acts of the Russian Federation on the processing and security of personal data;
- registration of a written obligation not to disclose personal data, the form of which is approved by the order of the rector of the Academy.

8.3. Employees of the Academy, who, within the framework of their official duties, have access to personal data, are obliged to observe the personal data confidentiality regime at all stages of processing, which is signed by the relevant Agreement approved by the Academy's internal LNA.

8.4. Employees of the Academy who have access to personal data have the right to receive only those personal data that are necessary for them to perform official (labor) duties and must ensure their processing, excluding unauthorized access to them by third parties.

8.5. In the absence of an employee, there should be no documents and computer carriers containing personal data at his/her workplace.

8.6. Personal computers containing personal data must be protected by passwords, and employees must keep their PC passwords and corporate account passwords secret.

8.7. Employees are obliged to remove from the desktop paper with personal data and other media personal data.

8.8. Employees are required to block the monitor screen when leaving the workplace.

8.9. Heads of the structural units of the Academy and its branches that process personal data:

- form and update the list of employees of the structural unit involved in the processing of personal data, and make appropriate changes to the job descriptions of the above employees;
- organize the processing of personal data in the structural unit in accordance with the legislation of the Russian Federation in the field of personal data, this Regulation, other LNA Academy;
- carry out current control over the processing of personal data in structural units;
- ensure the confidentiality of personal data processed in the relevant structural unit;
- inform the person responsible for organizing the protection of personal data in the process of their processing at the Academy the Director of Legal Affairs of the Academy, about all facts and attempts of unauthorized access to personal data and other violations of the procedure for processing personal data;
- bear personal responsibility for the processing of personal data in structural units in accordance with the requirements of the legislation of the Russian Federation in the field of personal data, this Regulation and LNA Academy in the field of personal data.

9. List of actions with personal data terms and methods of their processing, as well as terms and procedure for storage and further destruction

9.1. The Academy collects, records, systematizes, accumulates, stores, refines (updates, changes), extracts, uses, transfers (distribution, provision, access), anonymizes, blocks, deletes and destroys personal data.

9.2. The processing of personal data in the Academy is carried out in the following ways:

non-automated processing of personal data;

- automated processing of personal data with or without the transfer of the received information over information and telecommunication networks;
- mixed.

9.3. The terms of processing, including storage, personal data of employees and other subjects of personal data on paper, other material media and in the form of scan images of documents on the PC of employees of Personal data containing personal data, as well as in ICpersonal data, are determined in the Academy in accordance with the legislation of the Russian Federation.

9.4. The stored personal data shall be protected from unauthorized access and copying. Technical and software tools shall meet the requirements established in accordance with the legislation of the Russian Federation, ensuring the protection of information.

9.5. If the terms of processing personal data are not established by federal law, their processing and storage shall be carried out no longer than the purposes of processing, including storage, require.

9.6. Personal data in the Academy are stored on paper and machine media, as well as in the information systems of the Academy (ISpersonal data) and on the ARM of Opersonal data employees, ensuring the safety of personal data and their protection from unauthorized access.

9.7. The Academy and its branches provide separate storage of personal data (material media, as well as files on the ARM), the processing of which is carried out for different purposes defined by this Regulation, and which contain different categories of personal data.

9.8. When storing material media or scan images containing personal data, conditions must be observed that ensure the safety of personal data and exclude unauthorized access to them.

9.9. Written consents of personal data subjects (employees and students (listeners)) are subject to scanning by the structural unit that received such consent and further storage on a closed network resource.

9.10. Written consents of other personal data subjects are subject to scanning and sending to the name of the person responsible for organizing the protection of personal data in the process of processing them at the Academy the Director of Legal Affairs of the Academy, who, in turn, stores such consents on a closed network resource or other secure storage place.

9.11. Procedure and time of destruction of personal data.

9.11.1. Structural subdivisions of the Academy carry out systematic monitoring and after achieving the goal or losing the need to achieve the purpose of processing, destroy personal data of subjects, other material media containing personal data, as well as delete personal data contained in personal data information systems, files stored on the ARM of an Opersonal data employee or on external rewritable data. electronic media, upon reaching the purpose of processing, with expired storage periods provided for by the legislation of the Russian Federation, or upon the occurrence of other legal grounds.

9.11.2. If the purpose of personal data processing is achieved, the Controller is obliged to stop processing personal data or ensure its termination (if the personal data processing is carried out by another person acting on behalf of the Controller) and destroy personal data or ensure their destruction (if the personal data processing is carried out by another person acting on behalf of the Controller) within a period not exceeding thirty (30) days. from the date of achievement of the purpose of personal data processing, unless otherwise provided by the contract, the party to which the beneficiary or guarantor is the Personal Data Subject, another agreement between the Controller and the Personal Data Subject or if the Controller is not entitled to process personal data without the consent of the Personal Data Subject on the grounds provided for by this Federal Law or other federal laws.

- 9.11.3. In case of withdrawal of personal data consent by the Subject to the processing of his personal data, the Controller is obliged to stop their processing or ensure the termination of such processing (if the processing of personal data is carried out by another person acting on behalf of the Controller) and in case the storage of personal data is no longer required for the purposes of personal data processing, destroy personal data or ensure their destruction (if the personal data is processed by another person acting on behalf of the Controller) processing of personal data is carried out by another person acting on behalf of the Controller within a period not exceeding 30 (thirty) days from the date of receipt of the said recall, unless otherwise provided by the contract, the party to which, the beneficiary or guarantor for which is the Personal Data Subject, another agreement between the Controller and the Personal Data Subject or if the Controller is not entitled to process personal data without the consent of the Personal Data Subject on the grounds provided for by this Federal Law or other federal laws.
- 9.11.4. In case of personal data processing by the Subject to the Controller with a request to terminate the processing of personal data, the Controller shall, within a period not exceeding 10 (ten) working days from the date of receipt by the Controller of the relevant request, terminate their processing or ensure the termination of such processing (if such processing is carried out by the person processing personal data), except for the cases provided for by the Controller. Items 2 11 of part 1 of Article 6, part 2 of Article 10 and part 2 of Article 11 of the Federal Law 152. The specified period may be extended, but not more than for 5 (five) working days, in case of sending by the Controller to the Personal Data Subject a reasoned notice indicating the reasons for extending the period for providing the requested information.
- 9.11.5. In the event that there is no possibility of destroying personal data within the period specified above, the Controller blocks such personal data or ensures their blocking (if personal data is processed by another person acting on behalf of the Controller) and ensures the destruction of personal data within a period of not more than 6 (six) months, unless another period is established by federal laws.
- 9.12. Removal of information containing personal data stored on the ARM of an employee of Personal data or on external rewritable electronic media from personal data information systems is carried out by a commission created in each structural unit on the basis of an order of the head of a structural unit, consisting of at least three employees of a structural unit, with the mandatory participation of a person, responsible for the processing of personal data in the relevant structural unit of the Academy (if any).
- 9.13. The form of the act on deletion (destruction) of information containing personal data is given in the appendix (Appendix No. 11). The storage of these acts is carried out in the structural unit, whose commission prepared and approved it, the storage period is 3 years from the date of approval of the act.

10. Measures taken by the Academy to ensure the performance of the Controller's duties in the processing of personal data

- 10.1. The measures necessary and sufficient to ensure the performance of the Controller's duties by the Academy, provided for by the legislation of the Russian Federation in the field of personal data, include, in particular:
- 10.2. acceptance of LNA and other documents in the field of processing and protection of personal data;

- organization of training and conducting methodological work with employees of the structural units of the Academy and its branches holding positions, in the replacement of which, according to job descriptions, personal data processing is carried out;
- obtaining consents of personal data subjects for the processing of their personal data;
- Separation of personal data processed without the use of automation tools from other information, in particular by fixing them on separate material carriers of personal data;
- provision of separate storage of personal data in ISpersonal data, or on ARMs and their tangible media, the processing of which is carried out for different purposes and which contain different categories of personal data;
- mandatory protection of ARM employees of the Academy with access passwords;
- processing of personal data, which must be carried out on the ARM in a secure execution, certified in accordance with industry requirements for information security;
- exchange and transfer of personal data between industry organizations, which should be carried out only through secure communication channels using the ViPNet-Greenat "Business Mail" or EOSDO. For recording, processing, storing and transferring personal data between departments of the Academy, recorded machine media optical disks (CD / DVD) can be used;
- establishment of a ban on the transfer of personal data of subjects of personal data through open communication channels (e-mail within the Academy and external email addresses, fax, shared network folders of the Academy of its structural units and branches, to which an unlimited number of persons has access), computer networks outside the zone controlled by the Academy, as well as the Internet without the application of measures established in the Academy to ensure the security of personal data (except for depersonalized personal data);
- ensuring the protection of documents containing personal data on paper and other tangible media during their transfer within the Academy and within its branches, by imposing a blank sheet on the text containing personal data, with the placement of such a document in a separate perforated package for documents (file), or an envelope;
- storage of material carriers of personal data in compliance with conditions that ensure the safety of personal data and exclude unauthorized access to them;
- ensuring storage of scan images of documents containing personal data, in accordance with this Provision;
- mandatory registration of consents to personal data processing from citizens, as well as citizens' requests for personal data processing by the office department of the Academy and the documentation support department of the Academy's branches (if it is available in the branch) in the EOSDO system. Branches that do not have a documentation support department send such reviews and appeals via a secure communication channel VipNet for registration in the office department of the Academy;
- After registration of the feedback received from citizens of consents to the processing of personal data, as well as requests of citizens on the processing of personal data, the office of the Academy (department of documentation support of branches, branches) transmits the

originals of such reviews and appeals received on paper, or in the form of an electronic document, if the document is received in this form, to the person responsible for organization of protection of personal data in the process of their processing in the Academy to the Director of Legal Affairs of the Academy for their registration in the Registration Journal (Appendix No. 12) and for further storage. These feedbacks and appeals are transmitted by the Director of Legal Affairs to the relevant division of the Academy through secure communication channels.

- identification of illegal processing and implementation of actions specified in paragraph 14.1. of this Regulation.
- Notification of personal data subjects about violations or destruction of personal data. On elimination of violations or destruction of personal data, the Controller shall notify the Personal Data Subject or his representative, and if the appeal of the Personal Data Subject or his representative or the request of the authorized body for protection of the rights of the Subjects personal data were sent by the authorized body for protection of the rights of the Subjects personal data, also the specified body;
- implementation of internal control of the compliance of personal data processing 152-FZ and the regulatory legal acts adopted in accordance with it with the requirements for the protection of personal data, LNA Academy by conducting inspections of compliance with this Regulation by the person responsible for organizing the protection of personal data in the process of their processing in the Academy the director for legal issues of the Academy;
- other measures provided for by the legislation of the Russian Federation in the field of personal data and the EU Regulation (GDPR).

11. Rights of Personal Data Subjects

11.1. Personal data subjects have the right to:

- obtaining full information about their personal data processed in the Academy, by sending an application in the form according to the appendix (Appendix No. 13);
- access to their personal data, including the right to obtain a copy of any record containing their personal data, except as provided for in the
- legislation of the Russian Federation in the field of personal data processing;
- the clarification of their personal data, their blocking or destruction in the event that personal data are incomplete, outdated, inaccurate, illegally obtained or are not necessary for the declared purpose of processing;
- Subjects of personal data have the right to withdraw consent to the processing of personal data by filling out an application in the prescribed form according to the appendix (Appendix No. 14), or by sending a withdrawal of consent to the processing of personal data to the Academy in any form in accordance with part 2 of Article 9 and part 5 of Article 21 of Federal Law-152. In case of withdrawal of personal data consent by the Subject to the processing of personal data, the Controller has the right to continue processing personal data without the consent of the Subject of personal data if there are grounds specified in paragraphs 2–11 of part 1 of Article 6, part 2 of Article 10 and part 2 of Article 11 of the Federal Law-152;

- taking measures provided for by law to protect their rights; appealing against the action or inaction of the Academy, carried out in violation of the requirements of the legislation of the Russian Federation in the field of personal data, to the authorized body for the protection of the rights of personal data subjects or to the court;
- Under the EU Regulation (GDPR), a foreign personal data subject also has the right to lodge a complaint with the supervisory authority of the EU Member State at the place of registration or residence, place of work or place where the alleged violation of the EU Regulation (GDPR) occurred;
- exercise of other rights provided for by law.

12. Monitoring compliance with the legislation of the Russian Federation and the Academy in the field of personal data, including the requirements for the protection of personal data

- 12.1. Control over compliance by the structural divisions of the Academy and its branches with the legislation of the Russian Federation and the Academy's LNA in the field of personal data, including the requirements for the protection of personal data, is carried out in order to verify the compliance of personal data processing in the structural divisions of the Academy and its branches with the legislation of the Russian Federation and the Academy's LNA in the field of personal data, including: requirements for the protection of personal data, as well as measures taken to prevent and detect violations of the legislation of the Russian Federation in the field of personal data, identify possible channels of leakage and unauthorized access to personal data, eliminate the consequences of such violations.
- 12.2. Internal control over compliance by the structural divisions of the Academy and its branches with the legislation of the Russian Federation and the Academy's LNA in the field of personal data, including the requirements for the protection of personal data, is carried out by the person responsible for the organization of personal data protection in the process of their processing at the Academy – the Director for Legal Affairs.
- 12.3. Internal control of the compliance of personal data processing FZ-152 and the regulatory legal acts adopted in accordance with it, the requirements for the protection of personal data, this Regulation, LNA Academy is carried out by the Legal and Corporate Support Group
- 12.4. Personal responsibility for compliance with the requirements of the legislation of the Russian Federation and LNA Academy in the field of personal data in the structural divisions of the Academy and its branches, as well as for ensuring the confidentiality and security of personal data in these divisions of the Academy is assigned to their managers.

13. Procedure for Internal Control over Compliance with the Legislation of the Russian Federation and LNA Academy in the Field of Personal Data, including Requirements for the Protection of Personal Data

- 13.1. Internal control of the compliance of personal data processing FZ-152 and the regulatory legal acts adopted in accordance with it with the requirements for the protection of personal data, PT-001 "Policy in the field of organizing the processing and ensuring the security of personal data", LNA Academy is carried out by the person responsible for organizing the protection of personal data in the process of their processing in the Academy Director of Legal Affairs.
- 13.2. Internal control is carried out by conducting checks of compliance with the requirements of personal data security.

13.3. The chairman of the commission formed to verify compliance with the requirements of personal data security shall be the person responsible for organizing the protection of personal data in the process of their processing at the Academy the director for legal issues.

13.4. Checks of compliance with the requirements of personal data security are carried out on the basis of the order of the Rector of the Academy (the person replacing it) in order to verify compliance by the structural units of the Academy with the requirements of FZ-152, as well as the LNA of the Academy, aimed at ensuring the security of personal data in the process of their processing, including this Regulation.

13.5. During the verification of compliance with the requirements of personal data security, the following are carried out:

- assessment of compliance of personal data processing in the structural divisions of the Academy with the established requirements of the LNA in the field of personal data;
- identification in structural units of the facts of unauthorized access to personal data, destruction, change, blocking, copying, illegal transfer or distribution of personal data, disclosure of information containing personal data, or loss of documents or other material carriers of information containing personal data;
- identification of possible channels of leakage and unauthorized access to personal data, elimination of the consequences of such violations;
- analysis of the causes and conditions contributing to the commission of violations of the established requirements in structural units, development of recommendations for their elimination.

13.6. The commission formed to verify compliance with the requirements for ensuring the security of personal data in the process of their processing is entitled to:

request and receive the necessary documents (information) to achieve the objectives of the inspection;

- access personal data information systems in the mode of viewing and sampling the necessary information;
- if necessary, apply to the management of the structural unit to take measures to suspend or terminate the processing of personal data carried out in violation of the requirements of the legislation of the Russian Federation and the LNA of the Academy in the field of personal data.

13.7. In case of detection in structural divisions of the Academy of facts of violation of the requirements of FZ-152, as well as LNA of the Academy, aimed at ensuring the security of personal data in the process of their processing, including this Provision, on the basis of the order of the Rector (person, his replacement) an official inspection is carried out in accordance with the requirements of the LNA of the Academy.

13.8. Based on the results of the verification of compliance with the requirements for personal data security or an internal audit, the Commission draws up an act (conclusion), which, after its approval by the Rector of the Academy, together with the materials of the inspection, is stored with the person responsible for organizing the protection of personal data in the process of their processing in the Academy the Director for Legal Affairs.

14. Procedure for dealing with personal data incidents

- 14.1. In case of detection of illegal processing of personal data carried out by the Controller or a person acting on behalf of the Controller, the Controller shall, within a period not exceeding 3 (three) working days from the date of this detection, stop the unlawful processing of personal data or ensure the termination of the unlawful processing of personal data by a person acting on behalf of the Controller. If it is impossible to ensure the lawfulness of personal data processing, the Controller shall, within a period not exceeding 10 (ten) working days from the date of detection of illegal personal data processing, be obliged to destroy such personal data or ensure their destruction. The Controller is obliged to notify the Subject of personal data or his representative about elimination of the committed violations or about destruction of personal data, and if the appeal of the Subject of personal data or his representative or the request of the authorized body for protection of the rights of the Subjects of personal data were sent by the authorized body for protection of the rights of the Subjects of personal data, also the specified body
- 14.2. In case of establishment of the fact of illegal or accidental transfer (provision, distribution, access) of personal data, which entailed violation of the rights of the Subjects of personal data, the Controller shall be obliged from the moment of detection of such incident by the Controller, authorized body for protection of the rights of the Subjects of personal data or other interested person to notify the authorized body for protection of the rights of the Subjects of personal data:
- within 24 (twenty-four) hours about the incident, about the alleged reasons that caused the violation of the rights of the Subjects of personal data, and the alleged harm caused to the rights of the Subjects of personal data, about the measures taken to eliminate the consequences of the relevant incident, as well as provide information about the person authorized by the Controller to interact with the authorized body for the protection of the rights of the Subjects of personal data, on issues related to the identified incident;
 - within 72 (seventy-two) hours about the results of the internal investigation of the identified incident, as well as provide information about the persons whose actions caused the identified incident (if any).

15. Liability for Violation of Regulations on the Processing and Protection of Personal Data

- 15.1. Persons guilty of violating the requirements of the legislation of the Russian Federation and LNA Academy in the field of personal data shall bear disciplinary, administrative, civil and criminal liability in accordance with the legislation of the Russian Federation.
- 15.2. Moral damage caused to the Subject of personal data due to violation of his rights, violation of the rules for processing personal data established by the legislation of the Russian Federation and the Academy's LNA in the field of personal data, as well as requirements for the protection of personal data, shall be compensated in accordance with the legislation of the Russian Federation regardless of compensation for property damage and incurred by the Subject of personal data damages.

16. Normative references

- 16.1. The Regulation is developed and determined in accordance with the following regulatory legal acts:
- Constitution of the Russian Federation;

- Labor Code of the Russian Federation;
- Federal Law No. 152-FZ of July 27, 2006 "On Personal Data";
- Federal Law No. 273-FZ of December 29, 2012 "On Education in the Russian Federation";
- Decree of the President of the Russian Federation of March 6, 1997 No. 188 "On Approval of the List of Confidential Information";
- Order of FSTEC of Russia of February 18, 2013 No. 21 "On approval of the composition and content of organizational and technical measures to ensure the security of personal data when processing them in personal data information systems";
- order of Roskomnadzor of September 5, 2013 No. 996 "On approval of requirements and methods for depersonalization of personal data";
- Order of Roskomnadzor dated 28.10.2022 No. 179 "On Approval of Requirements for Confirmation of Destruction of Personal Data";
- order of Roskomnadzor dated 14.11.2022 No. 187 "On approval of the procedure and conditions of interaction of the Federal Service for Supervision in the Sphere of Communications, Information Technologies and Mass Communications with Controllers within the framework of maintaining the register of incidents in the field of personal data";
- Resolution of the Government of the Russian Federation No. 687 of September 15, 2008 "On Approval of the Regulations on the Features of Personal Data Processing carried out without the use of automation tools";
- Resolution of the Government of the Russian Federation No. 512 of July 6, 2008 "On Approval of Requirements for Material Carriers of Biometric Personal Data and Technologies for Storing Such Data Outside Personal Data Information Systems";
- Resolution of the Government of the Russian Federation No. 1119 of November 1, 2012 "On Approval of Requirements for the Protection of Personal Data in their Processing in Personal Data Information Systems";
- the order of the Government of the Russian Federation of August 26, 2013 No. 729 "About the Federal information system "Federal register of information on documents on education and (or) on qualifications, documents on training";
- other normative legal acts of the Russian Federation and normative documents of authorized bodies of state power.

16.2. In order to implement the Regulations, the Academy develops the relevant LNA and other documents regulating the processing of personal data in the Academy.

17. Final provisions

17.1. The subject of personal data can receive any clarifications on issues of interest relating to the processing of his personal data by contacting the Academy by e-mail tar-info@rosatom.ru, or at the address: 249031, Kaluga region, Obninsk, Kurchatov St., 21. Tel.: (484) 396-88-33, 396-80-11.

- 17.2. This Regulation, if necessary, can be amended and supplemented in accordance with changes in the legislation of the Russian Federation in the field of personal data in the manner prescribed by the Academy.