

ROSATOM TECHNICAL ACADEMY

Full legal name in Russian: Автономная некоммерческая организация дополнительного профессионального образования «Техническая академия Росатома»

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POLICY ON THE ORGANISATION OF PERSONAL DATA PROCESSING AND SECURITY

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1 Purpose and scope

1.1 The policy in the field of organizing the processing and ensuring the security of personal data (hereinafter referred to as the Policy) at Rosatom Technical Academy (hereinafter referred to as the Academy) determines the main principles, goals, conditions and methods of processing personal data, lists of subjects and personal data processed in the Academy and its branches, the functions of the Academy and its branches in the processing of personal data, the rights of personal data subjects, and the personal data protection requirements implemented by the Academy and its branches.

1.2 The Policy has been 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 27 April 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)).

1.3 This document is mandatory for all employees of the Academy and its branches.

1.4 The provisions of the Policy serve as the basis for the development of local regulations regulating the processing of personal data of employees and other personal data subjects in the Academy and its branches.

2 Normative references

2.1 The Policy 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";
- - Resolution of the Government of the Russian Federation of September 15, 2008 No. 687 "On Approval of the Regulations on the Features of Personal Data Processing, Carried out Without the Use of Automation Means";
- - 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";
- - Resolution of the Government of the Russian Federation of August 26, 2013 No. 729 "On the Federal Information System "Federal Register of Information on Educational Documents and (or) on Qualifications, Documents on Training";
- - 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 during their processing 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";
- other normative legal acts of the Russian Federation and normative documents of authorized bodies of state power.

2.2 In order to implement the provisions of the Policy, the Academy develops relevant local regulations and other documents, including:

- - Regulations on the processing and protection of personal data;
- other local regulations and documents regulating personal data processing in the Academy.

3 Terms and Abbreviations

3.1 The following terms and definitions apply for the purposes of this Policy:

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

Blocking of personal data	temporary termination of personal data processing (unless the processing is necessary to clarify personal data)
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
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
Provision of personal data	actions aimed at disclosing personal data to a certain person or a certain circle of persons

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

3.2 Abbreviations:

PDIS - personal data information system.

LRA - local regulatory act.

RLA - regulatory legal act.

PD - personal data.

GDPR - Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (General Data Protection Regulation).

Federal Law No. 152-FZ - Federal Law No. 152-FZ of 27 July 2006 'On Personal Data'.

FRDEI - Federal Register of Data on Education and/or Qualification Documents and Training Documents.

FSTEC of Russia - Federal Service for Technical and Export Control of Russia.

4 Goals and principles of personal data processing

4.1 Academy, being the Controller of personal data, processes personal data of employees of the Academy and other Personal Data Subjects Not Associated with the Academy in the employment relationship.

4.2 The processing of personal data in the Academy is carried out with due regard to the need protection of the rights and freedoms of employees and other personal data subjects, in including the protection of the right to privacy, personal and Family secrecy, based on 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 meets the purposes of their processing are subject to processing;
- the content and volume of personal data processed corresponds to the stated 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;
- personal data storage is carried out in a form that allows to determine the subject of personal data, no longer than the purpose of personal data processing requires, if the storage period of personal data is not established by FZ-152, a contract to which the subject of personal data 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.

4.3 Personal data is processed in the Academy for the purposes of:

- ensuring compliance with the Constitution of the Russian Federation, legislative and other NPA 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;
- - ensuring throughput and intra-object modes at the facilities of the Academy;
- - formation of reference materials for internal information support 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;
- - identification of the users of the Academy's website as part of the use of the site's services, |: for the purpose of providing the user with personalized services, contacting the user if

necessary (including sending notifications, requests and information related to the use of services), as well as processing requests and requests from the user;

- - 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.

5 List of subjects whose personal data are processed in Academy

5.1 The Academy processes personal data of the following categories of subjects:

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

6 List of personal data processed at the Academy

6.1 The list of personal data processed by the Academy is determined in accordance with the legislation of the Russian Federation, the EU Regulation and the Academy's LNA, taking into account the purposes of personal data processing specified in Section 4 of the Policy.

6.2 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.

6.3 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 in the Academy only with the consent in writing of the subject of personal data, except for cases provided for by the legislation of the Russian Federation.

6.4 The processing of personal data authorized by the subject of personal data for distribution is carried out in the Academy on the basis of the consent of the subject of personal data to distribute in compliance with the prohibitions and conditions for the processing of personal data established by the subject of personal data.

7 Functions of the Academy in the implementation of personal data processing

7.1 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 Regulations and the LNA Academy 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, the written consent of the subject of personal data, unless otherwise provided by the legislation of the Russian Federation, his personal data may be included.

8.5 Access to personal data processed at the Academy is allowed only to employees of the Academy to perform their duties.

8.6 The processing of personal data 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, in cases where the criteria for the territorial application of the EU Regulation apply to the activities of the Academy and its affiliates for the processing of personal data.

8.7 The Controller shall ensure that the foreign state to whose territory personal data is transferred provides adequate protection of the rights of personal data subjects before the transfer of personal data is carried out.

8.8 Cross-border transfer of personal data on the territory of foreign states that do not provide adequate protection of the rights of personal data subjects may be carried out:

1. if there is a written consent of the subject of personal data to the cross-border transfer of his personal data.
2. in cases provided for by international treaties of the Russian Federation.
3. in cases provided for by federal laws, if it is necessary for the purpose of protecting the foundations of the constitutional order of the Russian Federation, ensuring the defense of the country and the security of the state, as well as ensuring the safety of the sustainable and safe functioning of the transport complex, protecting the interests of the individual, society and the state in the field of transport complex from acts of illegal interference.
4. in case of execution of the contract to which the subject of personal data is a party.
5. in case of protection of life, health, other vital interests of the subject of personal data or other persons in case of impossibility of obtaining consent in writing of the subject of personal data.

9 List of actions with personal data and methods of their processing

9.1 The Academy shall collect, record, systematize, accumulate, store, clarify (update, change), extract, use, transfer (distribution, provision, access), depersonalization, blocking, deletion and destruction of 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;
- distribution of personal data, as well as other illegal actions in relation to personal data;
- appoint the person responsible for organizing the processing of personal data at the Academy;
- Publishes LNA, defining the policy and issues of processing and protection of personal data in the Academy;
- - familiarizes employees of the Academy, its branches and representative offices directly engaged in the processing of personal data with the provisions of the legislation of the Russian Federation and LNA of the Academy in the field of personal data, including the requirements for the protection of personal data, and trains these employees; publishes or otherwise provides unrestricted access to this Policy;
- - informs in accordance with the established procedure to personal data subjects or their representatives of information on the availability of personal data relating to the relevant subjects, provides an opportunity to familiarize yourself with these personal data when contacting and (or) receiving requests from these personal data subjects or their representatives, unless otherwise established by the legislation of the Russian Federation;
- - stops processing and destroys personal data in cases provided for by the legislation of the Russian Federation in the field of personal data and the EU Regulation;
- performs other actions provided for by the legislation of the Russian Federation in the field of personal data and the EU Regulation.

8 Conditions of personal data processing in the Academy

8.1 The processing of personal data in the Academy is carried out with the consent of the subject of personal data to the processing of his personal data, unless otherwise provided by the legislation of the Russian Federation in the field of personal data.

8.2 The Academy, without the consent of the subject of personal data, does not disclose to third parties and does not distribute personal data, unless otherwise provided for by FZ-152.

8.3 The Academy has the right to entrust the processing of personal data to another person on the basis of a contract concluded with this person. The contract must contain a list of actions (operations) with personal data that will be performed by the person processing personal data, the purposes of processing; the obligation of such a person to respect the confidentiality of personal data and ensure the security of personal data during their processing, as well as the requirements for the protection of personal data processed in accordance with Article 19 of the Federal Law No. 152-FZ.

8.4 For the purposes of internal information support, the Academy may create directories, address books and other sources to which the Academy is obliged to automated processing of personal data with or without the transfer of information received via information and telecommunication networks.

10. Rights of personal data subjects 10.1 Personal data subjects have the right to:

- - full information about their personal data processed at the Academy;
- access to their personal data, including the right to obtain a copy of any record containing their personal data, except as provided for in Federal Law 152, as well as access to medical data relating to them with the help of a medical specialist of their choice;
- - 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;
- - Withdrawal of consent to the processing of personal data;
- - 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;
- In accordance with the 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 GDPR occurred;
- exercise of other rights provided for by law.

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

11.1 Measures necessary and sufficient to ensure compliance with the Academy of Controller Duties Under Legislation The Russian Federation in the field of personal data include:

- appointment of the person responsible for the organization of personal data processing at the Academy;
- 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 structural units of the Academy administration and its branches holding positions included in the list

- positions of structural subdivisions of the Academy administration and its branches, when replacing which personal data is processed;
- obtaining consents of subjects of personal data for the processing of their personal data, with the exception of cases provided for by the legislation of the Russian Federation;
- 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, in special sections;
- - ensuring separate storage of personal data and their material carriers, the processing of which is carried out for different purposes and which contain different categories of personal data;
- ensuring the security of personal data when transferring them through open communication channels;
- storage of material carriers of personal data in compliance with conditions that ensure the safety of personal data and exclude unauthorized access to them;
- - implementation of internal control of the compliance of personal data processing FZ-152 and the requirements for the protection of personal data adopted in accordance with it by the NPA, this Policy, LNA Academy;
- other measures provided for by the legislation of the Russian Federation in the field of personal data and the EU Regulation.

11.2 Measures to ensure the security of personal data during their processing in IPpersonal data are established in accordance with the Academy's LNA, which regulates the issues of ensuring the security of personal data when they are processed in the Academy's personal data.

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

12.1 Monitoring of compliance by structural divisions of the Academy and its branches with the legislation of the Russian Federation and LNA Academy 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 structural divisions of the Academy and its branches with the legislation of the Russian Federation and LNA Academy 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 structural divisions of the Academy and its branches with the legislation of the Russian Federation and LNA Academy in the field of personal data, including the requirements for the protection of personal data, is carried out by a person appointed by order of the Academy responsible for the organization of personal data processing in the Academy.

12.3 Internal control of compliance of personal data processing with the Federal Law FZ-152 and the requirements for personal data protection adopted in accordance with it by the NPA, this Policy, LNA Academy is carried out by the Legal Department of the Academy.

12.4 Personal responsibility for compliance with the requirements of the legislation of the Russian Federation and the Academy in the field of personal data in the head unit of the Academy and its branches, as well as for ensuring the confidentiality and security of personal data in these divisions of the Academy shall be assigned to their managers.

13 Final provisions

13.1 This Policy is publicly available and in accordance with Part 2 of Art. 18.1 FZ-152 is subject to posting on the official website of the Academy.

13.2 The subject of personal data during the use of the website of the Academy and the provision of his personal data may receive any clarifications on issues of interest relating to the processing of his personal data by contacting the Academy by e-mail info@rosatomtech.ru.

13.3 This Policy may be amended and supplemented in accordance with the procedure established in the Academy, if necessary.