



Approved by
General Director
LLC «IceCor»
Karaseva E. V.
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**PERSONAL DATA PROTECTION AND PROCESSING POLICY
Of
LIMITED LIABILITY COMPANY
«IceCor»**

Moscow

1. General provisions

1.1. This Policy of the limited liability company «IceCor» regarding the processing of personal data (hereinafter - the Policy) is developed in compliance with the requirements of paragraph 2, Part 1, Article 18.1 of the Federal Law of 27.07.2006 No. 152-FZ "On Personal Data" (hereinafter – the Law on Personal Data) in order to ensure the protection of the rights and freedoms of a person and a citizen when processing their personal data, including the protection of the rights to privacy, personal and family secrets.

1.2. The Policy applies to all personal data processed by the limited liability company «IceCor» (hereinafter - the Operator, LLC «IceCor»).

1.3. The Policy applies to relations in the field of personal data processing that arose with the Operator both before and after the approval of this Policy.

1.4. In compliance with the requirements of Part 2 of Article 18.1 of the Law on Personal Data, this Policy is published in free access on the Internet information and telecommunications network on the Operator's website.

2. Terms and accepted abbreviations

Personal data – any information related directly or indirectly to a specific or identifiable individual (the subject of personal data).

Personal data authorized by the subject of personal data for distribution is personal data, access to which is granted to an unlimited number of persons by the subject of personal data by giving consent to the processing of personal data authorized by the subject of personal data for distribution.

Personal data operator (operator) – a state body, a municipal body, a legal entity or an individual who independently or jointly with other persons organizes and (or) performs the processing of personal data, as well as determines the purposes of processing personal data, the composition of personal data to be processed, actions (operations) performed with personal data.

Personal data processing – any action (operation) or a set of actions (operations) with personal data performed with or without the use of automation tools. The processing of personal data includes, but is not limited to:

- collection;
- record;
- systematization;
- accumulation;
- storage;
- clarification (update, change);
- extract;
- usage;
- transfer (provision, access);
- dissemination ; ;
- depersonalization;
- blocking;
- delete;
- destruction.

Provision of personal data – actions aimed at disclosing personal data to a certain person or a certain circle of persons.

Blocking of personal data – temporary termination of the processing of personal data (except in cases where the processing is necessary to clarify personal data).

Destruction of personal data – actions that make it impossible to restore the content of personal data in the personal data information system and (or) as a result of which the material carriers of personal data are destroyed.

Depersonalization of personal data – actions that make it impossible to determine the identity of personal data to a specific personal data subject without using additional information.

Information system of personal data – a set of personal data contained in databases and providing their processing, information technologies and technical means.

Cross-border transfer of personal data – the 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.

3. Procedure and conditions for the processing and storage of personal data.

3.1. The processing of personal data is carried out by the Operator in accordance with the requirements of the legislation of the Russian Federation.

3.2. The processing of personal data is carried out with the consent of the subjects of personal data to the processing of their personal data, as well as without it in the cases provided for by the legislation of the Russian Federation.

3.3. Consent to the processing of personal data authorized by the subject of personal data for distribution is issued separately from other consents of the subject of personal data to the processing of his personal data.

3.4. Consent to the processing of personal data authorized by the personal data subject for distribution may be provided to the operator:

- directly;
- using the information system of the authorized body for the protection of the rights of personal data subjects.

3.5. The Operator performs both automated and non-automated processing of personal data.

3.6. The Operator's employees, whose job responsibilities include the processing of personal data, are allowed to process personal data.

3.7. The processing of personal data is carried out by:

- receiving personal data in oral and written form directly with the consent of the personal data subject to the processing or dissemination of his personal data;
- entering personal data into the Operator's logs, registers and information systems;
- use of other methods of processing personal data.

3.8. Not permitted disclosure to third parties and distribution of personal data without the consent of the personal data subject, unless otherwise provided by Federal law.

3.9. Transfer of personal data to the bodies of inquiry and investigation, to the Federal tax service, Pension Fund, social insurance Fund and other competent authorities of the Executive and the organization is carried out in accordance with the legislation of the Russian Federation.

3.10. The Operator takes the necessary legal, organizational and technical measures to protect personal data from unauthorized or accidental access to it, destruction, modification, blocking, distribution and other unauthorized actions, including:

- identifies threats to the security of personal data during their processing;
- adopt local regulations and other documents regulating relations in the field of personal data processing and protection;

- appoints persons responsible for ensuring the security of personal data in the Operator's structural divisions and information systems;
- creates the necessary conditions for working with personal data;
- organizes the accounting of documents containing personal data;
- organizes work with information systems where personal data is processed;
- stores personal data in conditions that ensure their safety and prevent unauthorized access to them;
- organizes training of the Operator's employees who process personal data.

3.11. The Operator stores personal data in a form that allows identifying the subject of personal data for no longer than the purposes of processing personal data require, unless the period of storage of personal data is established by federal law, contract or agreement.

3.12. When collecting personal data, including through the Internet information and telecommunications network, the Operator ensures the recording, systematization, accumulation, storage, clarification (update, change), extraction of personal data of citizens of the Russian Federation using databases located on the territory of the Russian Federation, except for the cases specified in the Law on Personal Data.

3.13. Purposes of personal data processing:

3.13.1. Only personal data that meets the purposes of their processing is subject to processing.

3.13.2. The processing of personal data by the Operator is carried out for the following purposes •

- ensuring compliance with the Constitution, federal laws and other regulatory legal acts of the Russian Federation;
- implementation of its activities in accordance with the charter of «IceCor» LLC;
- personnel records management;
- assistance to employees in employment, education and promotion, ensuring the personal safety of employees, monitoring the quantity and quality of work performed, ensuring the safety of property;
- recruitment and selection of candidates to work with the Operator;
- organization of individual (personalized) registration of employees in the mandatory pension insurance system;
- filling in and submitting the required reporting forms to the executive authorities and other authorized organizations;
- implementation of civil law relations;
- maintaining accounting records;
- implementation of the pass mode.

3.14.3. The processing of personal data of employees may be carried out solely for the purpose of ensuring compliance with laws and other regulatory legal acts.

3.15. Categories of personal data subjects.

The PD of the following PD subjects is processed:

- individuals who have an employment relationship with the Company;
- individuals who have retired from the Company;
- individuals who are candidates for employment;
- individuals who have civil relations with the Company.

3.16. PD processed by the Operator:

- data obtained in the course of employment relations;
- data obtained for the selection of job candidates;
- data obtained in the course of civil law relations.

3.17. Storage of PD.

3.17.1. The PD of the subjects can be received, processed further and transferred for storage both on paper and in electronic form.

3.17.2. Traffic regulations recorded on paper are stored in lockable cabinets or in lockable rooms with limited access rights.

3.17.3. PD of subjects processed using automation tools for different purposes are stored in different folders.

3.17.4. It is not allowed to store and place documents containing PD in open electronic directories (file sharing sites) in the ISPD.

3.17.5. Storage of PD in a form that allows to identify the subject of PD is carried out no longer than the purposes of their processing require, and they are subject to destruction upon achievement of the processing goals or in case of loss of the need to achieve them.

3.17. Destruction of PD.

3.17.1. The destruction of documents (media) containing PD is carried out by burning, crushing (crushing), chemical decomposition, transformation into a shapeless mass or powder. For the destruction of paper documents, the use of a shredder is allowed.

3.17.2. Traffic regulations on electronic media are destroyed by erasing or formatting the media.

3.17.3. The fact of destruction of PD is documented by the act of destruction of carriers.

4. Personal data Protection

4.1. In accordance with the requirements of regulatory documents, the Operator has created a system for the protection of personal data (SPPD), consisting of subsystems of legal, organizational and technical protection.

4.2. The legal protection subsystem is a set of legal, organizational, administrative and regulatory documents that ensure the creation, operation and improvement of the SPPD.

4.3. The organizational protection subsystem includes the organization of the management structure of the SPPD, the authorization system, and the protection of information when working with employees, partners, and third parties.

4.4. The main PD protection measures used by the Operator are::

4.5.1. Appointment of a person responsible for the processing of PD, who organizes the processing of PD, training and instructing, internal control over the compliance of the institution and its employees with the requirements for the protection of PD.

4.5.2. Identification of current threats to the security of PD when they are processed in the ISPD and development of measures and measures to protect PD.

4.5.3. Development of a policy regarding the processing of personal data.

4.5.4. Establishing the rules for access to the PD processed in the ISPD, as well as ensuring the registration and accounting of all actions performed with the PD in the ISPD.

4.5.5. Setting individual passwords for employees ' access to the information system in accordance with their work responsibilities.

4.5.6. The use of information security tools that have passed the compliance assessment procedure in accordance with the established procedure.

4.5.7. Certified antivirus software with regularly updated databases.

4.5.8. Compliance with the conditions that ensure the safety of PD and exclude sanctioned access to them.

4.5.9. Detection of unauthorized access to personal data and taking measures.

4.5.10. Recovery of PD modified or destroyed due to unauthorized access to them.

4.5.11. Training of the Operator's employees directly engaged in the processing of personal data on the provisions of the legislation of the Russian Federation on personal data, including the requirements for the protection of personal data, documents defining the Operator's policy regarding the processing of personal data, local acts on the processing of personal data.

4.5.12. Implementation of internal control and audit.

5. Basic rights of the PD subject and responsibilities of the Operator

5.1. Basic rights of the PD subject.

The subject has the right to access his personal data and the following information:

- confirmation of the fact of PD processing by the Operator;
- legal basis and purpose of PD processing;
- goals and methods of PD processing used by the Operator;
- the name and location of the Operator, information about persons (except for employees of the Operator) who have access to the PD or to whom the PD may be disclosed on the basis of a contract with the Operator or on the basis of a federal law;
- terms of processing of personal data, including the terms of their storage;
- the procedure for the exercise by a PD subject of the rights provided for by this Federal Law;
- the name or surname, first name, patronymic and address of the person who processes the PD on behalf of the Operator, if the processing is or will be entrusted to such a person;
- contacting the Operator and sending them requests;
- appeal against the actions or omissions of the Operator.

5.2. Responsibilities of the Operator.

The operator must:

- when collecting PD, provide information about the processing of PD;
- if the PD was not received from the subject of the PD, notify the subject;
- in case of refusal to provide PD to the subject, the consequences of such refusal are explained;
- publish or otherwise provide unrestricted access to the document defining its policy regarding the processing of PD, to information about the implemented requirements for the protection of PD;
- take the necessary legal, organizational and technical measures or ensure that they are taken to protect the PD from unauthorized or accidental access to them, destruction, modification, blocking, copying, provision, distribution of the PD, as well as from other illegal actions in relation to the PD;
- provide answers to requests and appeals of PD subjects, their representatives and the authorized body for the protection of the rights of PD subjects.

6. Updating, correction, deletion and destruction of personal data, responses to requests of subjects for access to personal data.

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6.1. Confirmation of the fact of personal data processing by the Operator, the legal grounds and purposes of personal data processing, as well as other information specified in Part 7 of Article 14 of the Law on Personal Data, are provided by the Operator to the personal data subject or his representative when contacting or receiving a request from the personal data subject or his representative.

The information provided does not include personal data related to other personal data subjects, except in cases where there are legal grounds for the disclosure of such personal data.

The request must contain:

- the number of the main identity document of the personal data subject or its representative, information about the date of issue of the specified document and the issuing authority;
- information confirming the participation of the personal data subject in relations with the Operator (contract number, date of conclusion of the contract, conditional verbal designation and (or) other information), or information otherwise confirming the fact of processing of personal data by the Operator;
- signature of the personal data subject or his representative.

The request can be sent in the form of an electronic document and signed with an electronic signature in accordance with the legislation of the Russian Federation.

If the request (request) of the personal data subject does not reflect all the necessary information in accordance with the requirements of the Law on Personal Data, or the subject does not have access rights to the requested information, then a reasoned refusal is sent to him.

The right of the personal data subject to access his personal data may be restricted in accordance with Part 8 of Article 14 of the Law on Personal Data, including if the access of the personal data subject to his personal data violates the rights and legitimate interests of third parties.

6.2. If inaccurate personal data is detected during the request of the personal data subject or his representative, or at their request or at the request of Roskomnadzor, the Operator blocks personal data related to this personal data subject from the moment of such request or receipt of the specified request for the verification period, if the blocking of personal data does not violate the rights and legitimate interests of the personal data subject or third parties.

In case of confirmation of the fact of inaccuracy of personal data, the Operator, based on the information provided by the subject of personal data or his representative or Roskomnadzor, or other necessary documents, clarifies the personal data within seven working days from the date of submission of such information and removes the blocking of personal data.

6.3. In case of detection of illegal processing of personal data at the request (request) of the subject of personal data or his representative or Roskomnadzor, the Operator blocks the illegally processed personal data related to this subject of personal data from the moment of such request or receipt of the request.

6.4. When the purposes of personal data processing are achieved, as well as in the event that the personal data subject withdraws consent to their processing, the personal data is subject to destruction if:

- nothing else is provided for in the contract to which the personal data subject is a party, beneficiary or guarantor.;
- the operator does not have the right to process personal data without the consent of the subject on the grounds provided for by the Law on Personal Data or other federal laws;
- no other agreement between the Operator and the personal data subject provides otherwise.

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