

APPROVED

Chief Operating Officer

“SYNERGY” University

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“SYNERGY” University
Personal Data Processing Policy

Moscow

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1. PURPOSE

- 1.1. This document defines the policy of "Synergy" university (hereinafter - the University) in respect of processing of personal data (hereinafter - personal data).
- 1.2. The present personal data processing policy (hereinafter - the Policy) is executed in accordance with paragraph 2 Art.18.1 of the Federal Law of the Russian Federation "On Personal Data" №152-FZ dated July 27, 2006 and applies to all personal data processed in the "Synergy" University, which can be obtained both from the natural or legal person (company), bound by contractual relationships with the University, as well as on the subject of personal data bound by labor relationships with the University (hereinafter - the Employee).
- 1.3. The purpose of this Policy is to protect the interests of the University, its students, partners and employees, as well as compliance with the Russian legislation on personal data.
- 1.4. The Policy applies to personal data obtained both before and after the approval hereof.
- 1.5. The Policy is required to be read by persons who transfer their personal data to the University.
- 1.6. The current version of the Policy shall be published at the university's Web site in the public domain and comes into force from the moment of its placement.

2. GENERAL PROVISIONS

2.1. Application of the policy

- 2.1.1. This Policy shall apply to the University's processes, which imply personal data processing of subjects of any category, as well as units involved in the above processes.
- 2.1.2. The main provisions of the document can be also applied to the units of other organizations and institutions engaged in cooperation with the University as suppliers and consumers (users) of information.

2.2. Regulatory reference

- 2.2.1. The legal basis for this Policy is stipulated by the Federal Law "On Personal Data» №152-FZ dated July 27, 2006.

2.3. Terms, definitions and abbreviations

- 2.3.1. The below terms, definitions and abbreviations used herein shall have the following meanings:
 - **personal data** - any information related to a directly or indirectly defined individual (personal data owner(subject));
 - **operator** - a public authority, municipal authority, legal or natural person, alone or jointly with others, organizing and (or) carrying out the processing of personal data, as well as defining the purpose of personal data processing, the composition of personal data to be processed, the actions (operations) committed to the personal data;
 - **personal data processing** - any action (operation) or a set of actions (operations) performed with the use of automation equipment or without the use of such means to personal data, including collection, recording, systematization, accumulation, storage, clarification (update, modification), extraction, use, transfer (distribution, provision of access), depersonalization, blocking, deletion, destruction of personal data.

3. PRINCIPLES OF PERSONAL DATA PROCESSING

- 3.1. The University's personal data shall be processed in accordance with the principles established by the Federal Law of the Russian Federation "On Personal Data":
 - processing of personal data shall be carried out on legal and equitable basis;
 - processing of personal data is limited to the achievement of specific, pre-defined and legitimate objectives. The processing of personal data shall be compatible with the purposes of collecting personal data;
 - databases, containing personal data to be processed in purposes incompatible with each other, shall not be joined together;

- personal data to be processed shall mean the purposes of its processing;
 - content and scope of the personal data processing shall correspond to the declared purposes. Processed personal data shall not be excessive in relation to the stated goals of processing;
 - processing of personal data is provided by the accuracy of the personal data, their sufficiency and, where appropriate, their relevancy in relation to the stated goals of the processing;
 - storage of personal data shall be carried out in a form, allowing to define the subject of the personal data no longer than it is required by the purpose of personal data processing, if personal data storage period is established by federal law, where the subject of personal data is a beneficiary or guarantor. The processed personal data shall be destroyed or depersonalization for achieving the purposes of processing or if it's no longer required to achieve these purposes, unless otherwise provided by federal law.
- 3.2. The personal data safety is provided by the University by means of the implementation of agreed measures aimed at preventing (neutralization) and removal of threats to security of personal data, minimization of possible damage, as well as measures for the restoration of data and operation of information systems of personal data in the case of the threats.

4. PURPOSES OF COLLECTION AND PROCESSING OF PERSONAL DATA

- 4.1. The University collects and stores personal data of its employees, as well as personal data of other subjects received from counterparties needed to provide services, execute the relevant agreements or contracts, where the subject of personal data is a beneficiary or guarantor.
- 4.2. The University is entitled to use the data for the following purposes:
- 4.2.1. Identification of the parties under the agreements with the University;
 - 4.2.2. Communication with the subject, if necessary, including sending notifications and information requests related to the provision of services, as well as claims, requests and applications processing;
 - 4.2.3. Improving the quality of services provided by the University;
 - 4.2.4. Promotion of goods, works and services on the market by engaging in direct communications with the personal data subject;
 - 4.2.5. Conducting statistical and other studies based on anonymized data.
 - 4.2.6. the University collects and stores its employees' data necessary for the execution of corresponding employment contract as well as the rights and duties in accordance with labor legislation.
 - 4.2.7. Observance of the Russian legislation, normative acts of the University.
 - 4.2.8. Execution of the objectives laid down in the Charter of the University.

5. TERMS OF PERSONAL DATA PROCESSING

- 5.1. Processing of personal data in the University shall be carried out under the following terms:
- processing of personal data is carried out with the consent of the personal data subject to the processing of his/her personal data;
 - processing of personal data is carried out without the consent of the personal data subject to the processing of his personal data for the purposes provided by contracts; Labour Code of the Russian Federation of 30.12.2001 № 197-FZ; Civil Code of the Russian Federation; Tax Code of the Russian Federation (Part One - The Federal Law of 31.07.1998, № 146- FZ; Part Two - The Federal Law of 05.08.2000, № 117 - FZ); the Federal Law of 24 July 2009 N 212-FZ "On Insurance Contributions to the Pension Fund of the Russian Federation, the Social Insurance Fund of the Russian Federation, the Federal fund for obligatory medical insurance"; the Federal Law of 15 December 2001 N 167-FZ "On Mandatory Pension Insurance in the Russian Federation", and for the implementation and enforcement conferred by the legislation of the Russian Federation of the Operator's functions, powers and duties;
 - personal data processing is necessary to achieve the goals of the Russian Federation, international treaty or law, to implement and fulfill the laws of the Russian Federation on the

operator's functions, powers and duties;

- personal data processing is necessary for the administration of justice, execution of the judicial act, act of another body or official to be executed in accordance with the Russian legislation on enforcement proceedings;
 - processing of personal data is necessary for the execution of a contract where the subject of personal data is a beneficiary or guarantor, as well as to conclude an agreement on the initiative of the personal data subject or a contract by which the data subject will be the beneficiary or guarantor;
 - personal data processing is necessary to protect the life, health or other vital interests of the personal data subject, if the personal data subject's consent cannot be received;
 - processing of personal data necessary to exercise the rights and legitimate interests of the operator or third parties, or to achieve the objectives of public interest, provided that this does not violate the rights and freedoms of the personal data subject;
 - processing of personal data for statistical or other research purposes, subject to the compulsory depersonalization of personal data. An exception is the processing of personal data for the purpose of promotion of the goods, works and services in the market by making direct contact with a potential customer by means of communication;
 - an unlimited number of persons are granted access to the personal data by its subject (owner), or at his request (hereinafter - personal data made publicly available by a personal data subject);
 - personal data to be published or mandatory discloses in accordance with federal law is subject to processing.
- 5.2. If necessary, the University may include personal data of its employees in the public sources of personal data, and the University is required to take the written consent of the subject to the processing of his personal data.
- 5.3. The University does not process special categories of personal data relating to racial or ethnic origin, political opinions, religious or philosophical beliefs, health, sexual life of any subjects of personal data.
- 5.4. No biometric personal data (information that characterize the physiological and biological characteristics of the person, on the basis of which it is possible to establish his identity, used by the operator to determine the identity of the subject of personal data) are processed in the University.
- 5.5. The University carries out cross-border transfer of personal data. the cross-border transfer of personal data is carried out in foreign countries, to ensure adequate protection of the rights of personal data subjects.
- 5.6. No decisions can be adopted on the sole basis of the automated personal data processing means that give rise to legal effects in respect of the personal data subject or otherwise affect his/her rights and legitimate interests.
- 5.7. In the absence of the need to receive a subject's written consent to the processing his personal data, such consent may be provided by the subject of personal data or his representative in any applicable form.
- 5.8. The University shall be entitled to entrust the processing of personal data to another person with the consent of the subject of personal data, unless otherwise provided by federal law, based on the contract concluded with that person (hereinafter – the Operator's instructions). Thus, the University obliges the person who carries out the processing of personal data on behalf of the University, to respect the principles and rules for processing personal data, provided by the present Policy and the Russian Federation Federal Law "On Personal Data"
- 5.9. If the University requests another person to process the personal data, the University shall be liable to the subject of personal data for the actions of the said person. The person performing the processing of personal data on behalf of the University shall be responsible before the University.
- 5.10. The University undertakes and commits other persons who have access to personal data, not to disclose to third parties or distribute personal information without the consent of the personal data subject, unless otherwise stipulated by the legislation of the Russian Federation.

6. RIGHTS OF PERSONAL DATA OWNERS

6.1. The personal data subject has the right to:

- decide to provide his/her personal data to the operator of personal data;
- withdraw his/her consent to the personal data processing;

- make, amend or modify the personal data processed;
- require the exclusion of his/her personal data from publicly available sources of personal data;
- receive information regarding the personal data processing, including those comprising:
 - the operator's confirmation of the personal data processing;
 - legal basis and purpose of the personal data processing;
 - personal data processing objectives and methods applied by the operator;
 - name and location of the operator, information about persons (with the exception of employees of the operator), who have access to personal data or who may receive personal data on the basis of a contract with the operator, or on the basis of the Federal Law of the Russian Federation "On Personal Data";
 - the processed personal data relating to the relevant subject of personal data, their source, unless otherwise provided by the Federal Law of the Russian Federation "On Personal Data";
 - deadlines for processing of personal data, including the timing of their storage;
 - implementation by the subject of personal data of his/her rights under the Russian Federation Federal Law "On Personal Data";
 - information on the implementation of the implemented or proposed cross-border data transmission;
 - name or the surname, name and address of the person carrying out the processing of personal data on behalf of the operator, if the processing is performed or will be performed by this person;
 - Other information stipulated by the Russian Federation Federal Law "On Personal Data" or other federal laws of the Russian Federation.

6.2. The personal data subject rights to access his personal data may be limited in accordance with the federal laws of the Russian Federation.

7. UNIVERSITY OBLIGATIONS

7.1. In accordance with the requirements of the Federal Law № 152-FZ "On Personal Data", the University is obliged to:

- provide the personal data subject, on request, with information regarding the processing of their personal data or the legal refusal to provide it;
- at the request of the personal data subject, specify the personal data processed, block or delete, if the personal data are incomplete, outdated, inaccurate, or unlawfully obtained are not necessary for the stated purpose of their processing;
- keep a log of complaints accounting subjects of personal data, recording personal data subjects requests to personal data, as well as facts of personal data submission according these requests;
- notify the subject of the personal data in the event that personal data is not received from the personal data subject;
- in the case of achieving the goal of personal data processing immediately cease processing of personal data and destroy the corresponding personal data within a period not exceeding thirty days from the date of achieving personal data processing purposes unless otherwise provided by federal law, and inform the personal data subject or his legal representative, and if the appeal or request were sent by the personal data subjects rights' authority;
- on case of withdrawal of the personal data subject's consent to the processing of his personal data, stop the processing of personal data and destroy personal data in a period not exceeding thirty days from the date of receipt of this revocation, unless otherwise stipulated by the agreement between the University and the subject of personal data;
- notify the personal data subject on the destruction of his personal data;
- in the event of a personal data subject claim to termination of processing of personal data for the purpose of promotion of the goods, works and services on the market, immediately stop the processing of personal data.

8. SECURITY METHODS FOR PERSONAL DATA PROCESSING

8.1. When processing personal data, the University shall take the necessary legal, organizational and technical measures to protect personal data against unauthorized or accidental access, destruction, modification, blocking, copying, provision, distribution of personal data, as well as other illegal actions in relation to personal data.

8.2. The security of personal data shall be achieved by the following:

- definition of personal data security threats at their processing within the information systems of personal data;
- publication of local acts on the processing of personal data, as well as local acts establishing procedures aimed at preventing and detecting violations of the Russian legislation, elimination of the consequences of such violations;
- appointment of an employee responsible for organization of personal data processing;
- use of organizational and technical measures to ensure the security of personal data at their processing in information systems of personal data necessary to fulfill the requirements for protection of personal data, pursuant to which the Russian Government establishes a set level of personal data protection;
- use of the information protection means verified by the information assessment procedure in the prescribed manner ;
- assessing the effectiveness of measures taken to ensure the security of personal data before the entry into operation of personal data information system;
- taking into account the machine carriers of personal data;
- detection of unauthorized access to personal data and adoption of appropriate action;
- personal data restoration, modification or destruction as a result of unauthorized access to them;
- establishment of rules of access to personal data processed in the information systems, as well as the provision of registration and accounting of all acts committed with personal data in the information systems;
- supervision of the measures taken to ensure the security of personal data and the level of protection of personal data information systems.

9. AMENDMENTS TO THE POLICY

9.1. The University is entitled to amend this Policy.

9.2. When making amendments, the Policy title shall indicate the date of the last revision. The new version of the Policy shall enter into force upon its adoption, unless otherwise provided by the new version of the Policy.