

PERSONAL DATA PROCESSING AND PROTECTION REGULATIONS

1. GENERAL PROVISIONS

- 1.1. These personal data processing and protection Regulations (hereinafter referred to as Regulations) establish the procedure for processing of personal data of subjects of personal data presented on the web site of “The Institute for urban development of the Republic of Tatarstan” (state reg.N 1161690103981) as a partner of The World Urban Parks (hereinafter referred to as Organization) – name of the web site wupkazan.com These Regulations are developed in accordance with current legislation of Russian Federation.
- 1.2. The purpose of development of these Regulations is to prescribe the procedure of processing of personal data of subject of personal data; ensuring protection of rights and freedoms of subjects of personal data in processing of their personal data in the Organization; establishing the regime of confidentiality of personal data as well as establishing responsibility of officials having access to personal data for failure to comply with the requirements of rules, governing personal data processing and protection.
- 1.3. The purpose of processing of personal data is implementation of Organization’s obligations before subjects of personal data (users of web site) regarding the use of web site and its services (including, but not limited to):
 - ensuring compliance with Constitution of Russian Federation, legislative and other regulatory legal acts of Russian Federation;
 - registration of subject of personal data on web site;
 - identification of subject of personal data and establishment of communication and feedback with him;
 - providing to subject of personal data with access to the use of the site’s functions as well as sending emails;
 - providing to subject of personal data with information about Organization, services rendered by the Organization, holding of events, receiving newsletters and other information on behalf of Organization (web site), its affiliated persons or on behalf of partners of the Organization (web site);
 - providing to subject of personal data with technical support in case of arising problems and (or) issues related to using web site;
 - organization of participation of the subject of personal data in the events held by Organization;
 - analyzing age and gender composition of web site’s audience with purpose of understanding its needs and improving the products, services and web site content;

– for other legal purposes.

- 1.4. Organization shall process following data (categories of personal data):
 - personal data provided by User during filling of fields on web site, including during filling of registration form;
 - technical data which is automatically transmitted by the device with help of which User is using the web site, including technical characteristics of the device, IP address, information stored in cookies files that were sent to the User’s device, browser information, date and time of access to web site, the addresses of pages requested by User and other similar information.Namely, the organization processes following personal data of User:
 - Family name;
 - First name;
 - Patronymic name;
 - E-mail address;
 - Number of mobile telephone;
 - Field of activity;
 - Name of company/place of work;
 - Country;
 - City;
 - Postal address;
 - IP address assigned to User by provider of Internet services;
 - Information about browser of User (or other software program by which the access to services is made);
 - Names of pages visited by User on the web site, date and duration of visit

2. MAIN DEFINITIONS AND SCOPE OF PERSONAL DATA

Personal data is any information which directly or indirectly relates to definite or definable individual (subject of personal data). Personal data of subjects is confidential.

Subjects of personal data (subject/subjects) – individuals who are users of the Organization’s web site.

Personal data processing – any action (operation) or a set of actions (operations) performed by using automation tools or without using such tools in regard to personal data, including collection, recording, systematization, accumulation, storage, clarification (updating, changing), retrieval, use, transfer (distribution, submission, providing with access), depersonalization,

blocking, deletion, destruction of personal data.

Automated processing of personal data – processing of personal data by using computer technology.

Submission of personal data – actions aimed at the disclosure of personal data to a specific person or to certain range of persons.

Distribution of personal data – actions aimed at the disclosure of personal data to indefinite range of persons.

Use of personal data – actions (operations) with personal data performed by an official of the Organization in order to make decisions or perform other actions that create legal consequences in relation to subjects of personal data or other persons or otherwise affect their rights and freedoms or the rights and freedoms of other persons .

Blocking of personal data – temporary cease of processing of personal data (except for the cases, when processing is necessary to clarify personal data) .

Destruction of personal data – actions as the 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.

Depersonalization of personal data – actions as the result of which it becomes impossible to define the belonging of personal data to a specific subject of personal data without the use of additional information.

Personal data information system – set of personal data contained in databases and information technologies and technical means which ensure their processing.

Cross-border transfer of personal data is the transfer of personal data to the territory of foreign state to foreign government authority, foreign individual or foreign legal entity.

3. **COLLECTION OF PERSONAL DATA**

3.1. The procedure for obtaining personal data

3.1.1. The subject of personal data makes decision and agrees his personal data to be processed voluntarily by his will and in his interest. Consent for processing of personal data must be specific, informed and conscious. Consent for processing of personal data can be revoked by the subject of personal data.

3.2. In order to obtain personal data, the Organization shall request for consent of subject of personal data to process his personal data in cases stipulated by existing law (hereinafter - the Consent).

4. **STORAGE OF PERSONAL DATA**

4.1. Storage and use of personal data

4.1.1. Personal data can be obtained, be further processed and transferred for storage both on paper carriers and in electronic form.

4.1.2. Organization shall store personal data not longer than it is required for the purposes of processing personal data, if the storage period for personal data is not set. Personal data processed shall be destructed or depersonalized upon achievement of goals of processing. In case of loss the personal data necessary for purposes of processing, shall be also destructed or depersonalized upon achievement of this goal, unless otherwise provided by applicable law.

5. **ACCESS TO PERSONAL DATA**

5.1. Subjects of personal data whose personal data are processed by the Organization have the right:

- to receive information regarding processing of their personal data which can contain:
 - 1) confirmation of the fact of the processing of personal data by Organization;
 - 2) legal basis and purposes of processing personal data;
 - 3) purposes and methods used by the Organization for processing personal data;
 - 4) name and location of Organization, information about persons (except for employees of Organization) who have access to personal data or who can be disclosed personal data based on contract with Organization or based on federal law;
 - 5) personal data under processing related to relevant subject of personal data, the source of receipt of this data, unless otherwise stipulated by law for the sharing of such information ;
 - 6) terms of processing of personal data, including period of storage of personal data;
 - 7) procedure for the exercise of rights by subject of personal data stipulated by the Federal Law dated 27.07. 2006 No. 152 - FZ "About Personal Data";
 - 8) information about implemented or planned cross-border transfer of data;
 - 9) the name or surname, the first name, patronymic and address of the person performing processing of personal data on behalf of Organization, if the processing is entrusted or shall be entrusted to such person;
 - 10) other information stipulated by federal laws.
- require Organization to clarify their personal data, block or destroy it, if the personal data is incomplete, outdated, inaccurate, obtained illegally or is not necessary for reaching stated purpose of processing.
- exercise other rights provided by law.

5.1.2. Subject of personal data is obliged to inform Organization in timely manner about change of his personal data.

5.1.3. Organization is obliged to provide with information about the availability of personal data, as well as to provide with the opportunity to get acquainted with this personal data within 30 (thirty) days from the date of receipt of the request, unless otherwise provided by law. The relevant request should contain the number of main document, certifying identity of subject of personal data or his legal representative, data about the date of

issuance of specified document, the authority that issued it and own signature of subject of personal data or his legal representative. Organization is obliged to provide with information about personal data to the subject of personal data or his legal representative in accessible form and this information should not contain personal data related to other subjects of personal data, except for the cases provided by law.

6. PROTECTION AND DESTRUCTION OF PERSONAL DATA

6.1. Protection of personal data

6.1.1. The security of personal data is achieved by excluding possibility of unauthorized, including accidental, access to personal data which may result in the destruction, modification, blocking, copying, distribution of personal data as well as other unauthorized actions.

6.1.2. During processing of personal data, Organization is obliged to take necessary legal, organizational and technical measures or to ensure their taking for protection of personal data from unlawful or accidental access to it, destruction, modification, blocking, copying, submission, distribution of personal data as well as from other illegal actions in regard to personal data.

6.1.3. Ensuring security of personal data is achieved, in particular:

- 1) by defining threats to the security of personal data during their processing in personal data information systems;
- 2) by applying organizational and technical measures in order to ensure the security of personal data during processing of personal data in personal data information systems necessary in order to fulfill the requirements for the protection of personal data;
- 3) by applying procedure of assessment of the conformity of information protection means that was hold according to established procedure;
- 4) by evaluating effectiveness of measures taken for ensuring security of personal data prior to the start up of personal data information system;
- 5) by keeping record of data mediums with personal data;
- 6) by discovering and detecting the facts of unauthorized access to personal data and taking measures;
- 7) by restoring personal data modified or destroyed due to unauthorized access to such data;
- 8) by establishing rules for access to personal data processed in the personal data information system, as well as ensuring registration and record of all actions performed with personal data in the personal data information system;
- 9) by controlling measures taken to ensure security of personal data and the level of security of personal data information systems.

6.1.4. Organization must ensure protection of personal data from unlawful use or loss.

6.1.5. In order to ensure the protection of personal data, it is necessary to observe range of measures (including, but not limited to):

- rational arrangement of workplaces of employees, which would exclude the unauthorized use of confidential information;
- familiarization of employees of Organization with the requirements of regulatory and methodological documents for the protection of personal data;
- availability of necessary conditions for working with confidential documents and databases;
- prescription and regulation of composition of employees, having right of access to personal data;
- prescription of procedure for storing information which contains personal data;
- timely detection of violations of the law in part of protection of confidential information by employees of Organization;
- other measures required to be performed in accordance with law in part of ensuring security of personal data.

6.1.6. Confidentiality measures during collection, processing and storage of personal data apply to both paper and electronic (automated) information carriers.

6.1.7. Organization has right to apply technical protection methods and other methods provided for the protection of personal data that do not contradict to law of Russian Federation.

6.2. Clarification, blocking and destruction of personal data

6.2.1. In case of detection of unlawful processing of personal data or inaccurate personal data by the request of subject of personal data or his representative, Organization is obliged to block illegally processed personal data related to this subject of personal data or to ensure blocking of such data.

6.2.2. In case of confirmation of the fact of inaccuracy of personal data, the Organization shall, on the basis of information provided by subject of personal data or his representative or other necessary documents, clarify personal data or ensure clarification of such data.

6.2.3. If the goal of processing of personal data is achieved, Organization must stop processing of personal data or ensure cessation of its processing and destroy personal data or ensure their destruction.

6.2.4. In case of withdrawal of consent to the processing of personal data by the subject of personal data, Organization is obliged to stop processing of such data or to ensure the cessation of such processing and in case if saving of personal data is not longer required for the purposes of processing of personal data, to destroy personal data or ensure destruction of such data.

7. ACCESS TO PERSONAL DATA

- 7.1. The right for access to personal data of subjects of personal data in the Organization is possessed by:
- Director of the Organization;
 - those appointed by order of Director of Organization persons who are responsible for arrangement of processing of personal data;
 - employees who process personal data;

– the subject of personal data themselves or authorized representatives of subject;

7.2. Specified persons have right to access only that personal data that they need to perform specific functions, while copying and extracting data is allowed only subject to written permission of the person responsible for arrangement of processing of personal data or at the direct request of subject of personal data or his authorized representative .

8. **RESPONSIBILITY FOR DISCLOSURE OF INFORMATION RELATED TO PERSONAL DATA OF SUBJECT OF PERSONAL DATA**

8.1. Persons responsible for violation of rules governing the receipt, processing and protection of personal data of the subject of personal data bear disciplinary, administrative, civil or criminal liability in accordance with law of Russian Federation.

8.2. Non-pecuniary damage caused to a subject of personal data as the result of violation of his rights, violation of the rules for processing of personal data as well as violation of requirements to the protection of personal data established by law of Russian Federation, is subject to compensation in accordance with the law of Russian Federation.