

Personal Data Processing Policy the Creative Industries Federation

1. GENERAL PROVISIONS

1.1 This Personal Data Processing Policy (hereinafter referred to as the "Policy") of the Creative Industries Federation (hereinafter referred to as the "Association") has been developed in order to protect the rights and freedoms of the subject of personal data during the processing of his/her personal data.

1.2 Personal data refers to any information relating directly or indirectly to a specific or identifiable individual (the subject of personal data) specified in paragraph 4.1 of this Policy.

1.3 Processing of personal data is carried out by the Association in order to ensure the protection of rights and freedoms of individuals and citizens in the processing of their personal data, including the protection of rights to privacy, personal and family secrets.

2. PURPOSES OF PERSONAL DATA PROCESSING

2.1 Personal data is processed by the Association in the following cases and for the following purposes:

2.1.1. carrying out and performing the functions, powers and duties imposed on the Association by the legislation of the Russian Federation, in particular:

- compliance with labour and tax legislation;
- keeping current accounting and tax accounting, generation, preparation and timely submission of accounting, tax and statistical reports;
- compliance with legal requirements regarding the definition of processing and protection of personal data of citizens who are employees, participants, clients, attorneys or contractors of the Association (hereinafter - "personal data subjects")

2.1.2. the performance of activities by the Association in accordance with its Charter and other local regulations of the Association.

3. LEGAL BASIS FOR PROCESSING PERSONAL DATA

3.1 The processing of personal data shall be carried out on the basis of:

- the Constitution of the Russian Federation;
- the Labour Code of the Russian Federation;
- the Civil Code of the Russian Federation;
- Federal law No. 149-FZ of July 27, 2006 "On information, information technologies and information protection";
- the Regulation on the conditions of processing personal data carried out without the use of automation equipment as approved by the Decree of the Government of the Russian Federation dated September 15, 2008 No. 687;
- the Decree of the Government of the Russian Federation No. 1119 of November 01, 2012 "On the approval of the requirements for the protection of personal data during their processing in personal data information systems";
- the Order of FSTEC of Russia No. 21 dated February 18, 2013 "On the approval of composition and content of organizational and technical measures to ensure security of personal data during their processing in personal data information systems";
- other regulatory legal acts of the Russian Federation and regulatory documents of authorized government bodies;
- the Association Charter;
- regulation on personal data protection of employees of the Creative Industries Federation.

4. COMPOSITION OF PROCESSED PERSONAL DATA

4.1 The Association shall process personal data relating to the following subjects of personal data:

- members of the Association;
- employees of the Association;
- contractors of the Association, as well as individuals performing certain types of services (works) for the Association under civil-law contracts, whose personal data processing is carried out by the Association without distribution and solely for the performance of such contracts;
- individuals - participants of events organized and conducted by the Association (awards, competitions, forums, conferences, etc.), who provide personal data by filling out the registration form.

4.2 The subject of personal data decides to provide his/her personal data to the Association and gives consent to its processing freely, at his/her own will and in his/her own interest.

4.3 The Association shall ensure that the content and scope of personal data processed corresponds to the declared cases of processing and, if necessary, take measures to eliminate their redundancy.

5. PROCESSING OF PERSONAL DATA

5.1 The processing of personal data is carried out by the Association by the means of mixed processing of personal data.

5.2 The processing of personal data is any action (operation) or a set of actions (operations), performed with or without the use of automation means with personal data (mixed processing), including collection, recording, systematization, accumulation, storage, clarification (update, change), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, and destruction of personal data.

6. ENSURING THE PROTECTION OF PERSONAL DATA DURING ITS PROCESSING BY THE ASSOCIATION

6.1 The Association shall take measures necessary and sufficient to ensure the fulfilment of obligations under the Federal law of July 27, 2006 No. 152-FZ "On personal data" (hereinafter - the "Personal Data Law") and regulations adopted in accordance with it. The Association shall independently determine the composition and list of measures that are necessary and sufficient to ensure compliance with the obligations under the regulations, the list of which is provided in Section 3 of this Policy. In particular, such measures include:

- designation by the Association of a person responsible for organising the processing of personal data;
- issuance by the Association of documents defining the policy of the Association regarding the processing of personal data and local regulations on personal data processing;
- application of legal, organizational and technical measures to ensure personal data security;
- implementation of internal control and (or) audit of compliance of personal data processing with the "Personal Data Law" and other legal regulations adopted in accordance therewith, requirements to the protection of personal data, the policy of the Association on the processing of personal data and local regulations of the Association;
- determination of assessment of harm, which may be caused to subjects of personal data in case of a violation of the "Personal Data Law", and the ratio of said harm to measures taken by the Association aimed at ensuring the fulfilment of obligations under the "Personal Data Law".
- familiarization of employees of the Association, directly engaged in the processing of personal data, with the provisions of the legislation of the Russian Federation on personal data, including requirements for the protection of personal data and documents defining the policy of the Association regarding the processing of personal data, local regulations on the processing of personal data, and (or) training of the said employees.

6.2 When processing personal data, the Association shall take necessary legal, organizational and technical measures or ensure their adoption to protect personal data from unauthorized or accidental access, destruction, modification, blocking, copying, provision, distribution of personal data, as well as from other unlawful actions in relation to personal data.

7. THE RIGHT OF THE DATA SUBJECT ON ACCESS TO HIS PERSONAL DATA

7.1 The subject of personal data has the right to demand from the Association to clarify his personal data, block or destroy it, if the personal data is incomplete, outdated, inaccurate, illegally obtained or not necessary for the stated purpose of processing, as well as to take statutory measures to protect their rights.

7.2 Information is provided to the personal data subject or his or her representative by the Association when the personal data subject or his or her representative contacts or receives a request. The request must contain the number of the main identity document of the subject of personal data or his representative, information about the date of issue of the specified document and the issuing authority, information confirming the participation of the subject of personal data in relations with the Association (contract number, date of the contract, conventional word mark and (or) other information), or information otherwise confirming the processing of personal data by the Association, the signature of the subject of personal data or his representative. The request may be sent in the form of an electronic document and signed by an electronic signature in accordance with the legislation of the Russian Federation.

7.3 The Association has the right to refuse the personal data subject's repeated request. Such refusal must be motivated. The obligation to provide evidence of the validity of the refusal to comply with the repeated request lies with the Association.

7.4 A personal data subject shall have the right to receive information related to processing of their personal data, including:

- confirmation of the fact of personal data processing by the Association;
- legal basis and purpose of personal data processing;
- goals and methods of personal data processing used by the Association;
- processed personal data pertaining to the relevant personal data subject, their source, unless otherwise provided by the "Personal Data Law";
- terms of processing of personal data, including terms of their storage as provided by the "Personal Data Law";
- procedure for exercising by the subject of personal data of his/her rights provided by the "Personal Data Law";
- information about the performed or expected cross-border transfer of data
- name or surname, first name, middle name and address of the person processing personal data on behalf of the Association, if the processing is or will be entrusted to such a person.

7.5 If a personal data subject believes that the Association is processing his personal data in violation of the requirements of the "Personal Data Law" or otherwise violates his rights and freedoms, the personal data subject has the right to apply to the Association with a request to stop the use and processing of personal data of the respective person. Upon receipt of such a request, the Association ceases to use and process personal data of the respective person, and available to the Association personal data is destroyed within 30 (thirty) calendar days from the Association's date of receipt of the request from the personal data subject.
