

APPROVED

General Director of LLC Kotlin SK _____

P.Y.Ishkov

" ____ " _____ 20____ г.

Policy of Limited Liability Company "Kotlin SK" in respect of personal data processing

1. General Provisions

1.1. The present Policy of Limited Liability Company "Kotlin SK" regarding the processing of personal data (hereinafter - the Policy) is developed in fulfillment of the requirements of para. 2 ч. 1 part 1 of article 18.1 of the Federal Law dated 27.07.2006 N 152-FZ "On Personal Data" (hereinafter - the Law on Personal Data) in order to ensure the protection of human and civil rights and freedoms in the processing of personal data, including the protection of the right to privacy, personal and family secrecy.

1.2. The Policy applies to all personal data processed by the Limited Liability Company "Kotlin SK" (hereinafter referred to as the Operator, LLC "Kotlin SK").

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

1.4. Pursuant to the requirements of part 2 of Article 18.1 of the Law on Personal Data, this Policy is published in free access in the information and telecommunication network Internet on the Operator's website <https://www.kotlin-sc.ru/>.

1.5. Basic concepts used in the Policy:

personal data - any information related to directly or indirectly defined or identifiable <https://www.kotlin-sc.ru/>

personal data controller (operator) - a state authority, municipal authority, legal entity or natural person, independently or jointly 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 subject to processing, actions (operations) performed with personal data;

user - any visitor of the website <https://www.kotlin-sc.ru/>

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

- collection;
- entry;
- systematization;

- accumulation;
- storage;
- clarification (update, change);
- extraction;
- Utilization;
- transfer (distribution, provision, access);
- depersonalization;
- blocking;
- deletion;
- annihilation;

automated processing of personal data - processing of personal data by means of computer equipment;

dissemination of personal data - actions aimed at disclosure of personal data to an indefinite number of persons;

provision of personal data - actions aimed at disclosure of personal data to a certain person or a certain circle of persons;

blocking of personal data - temporary cessation of personal data processing (except for cases when processing is necessary to clarify personal data);

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;

depersonalization of personal data - actions, as a result of which it becomes impossible to determine the belonging of personal data to a particular subject of personal data without using additional information;

personal data information system - a set of information technologies and technical means contained in databases of personal data and ensuring their processing.

website - a set of graphic and informational materials, as well as computer programs and databases, ensuring their availability on the Internet at the network address <https://www.kotlin-sc.ru/>.

1.6. Basic rights and obligations of the Operator.

1.6.1. The operator shall have the right to:

- 1) to receive from the subject of personal data reliable information and/or documents containing personal data;
- 2) independently determine the composition and the list of measures necessary and sufficient to ensure the fulfillment of obligations stipulated by the Law on personal data and regulatory legal acts adopted in accordance with it, unless otherwise provided by the Law on personal data or other federal laws;

- 3) entrust personal data processing to another person with the consent of the personal data subject, unless otherwise provided for by federal law, on the basis of a contract concluded with this person. The person performing personal data processing on behalf of the Operator is obliged to comply with the principles and rules of personal data processing stipulated by the Personal Data Law, to observe confidentiality of personal data, to take necessary measures aimed at ensuring fulfillment of obligations stipulated by the Personal Data Law;
- 4) in case the personal data subject revokes his/her consent to personal data processing, the Operator has the right to continue processing personal data without the consent of the personal data subject if there are grounds specified in the Personal Data Law.

1.6.2. The operator is obligated to:

- 1) organize the processing of personal data in accordance with the requirements of the Personal Data Law;
- 2) respond to appeals and requests of personal data subjects and their legal representatives in accordance with the requirements of the Law on personal data;
- 3) report to the authorized body for the protection of the rights of personal data subjects (the Federal Service for Supervision of Communications, Information Technology and Mass Media (Roskomnadzor)) at the request of this body the necessary information within 10 working days from the date of receipt of such a request. This term may be extended, but not more than for five working days. For this purpose, the Operator should send a motivated notification to Roskomnadzor indicating the reasons for extending the deadline for providing the requested information;
- 4) in accordance with the procedure determined by the federal executive body authorized in the field of security, ensure interaction with the state system of detection, prevention and liquidation of consequences of computer attacks on information resources of the Russian Federation, including informing it of computer incidents that resulted in the unlawful transfer (provision, distribution, access) of personal data.

1.7. The basic rights of the subject of personal data. The subject of personal data has the right to:

- 1) receive information regarding the processing of his/her personal data, except in cases provided for by federal laws. Information shall be provided to the subject of personal data by the Operator in an accessible form and shall not contain personal data relating to other subjects of personal data, except in cases where there are legal grounds for disclosure of such personal data. The list of information and the procedure for obtaining it is established by the Law on Personal Data;
- 2) to demand from the operator to clarify his personal data, block or destroy them if the personal data are incomplete, outdated, inaccurate, illegally obtained or are not necessary for the stated purpose of processing, as well as to take measures provided for by law to protect his rights;
- 3) give prior consent to the processing of personal data in order to promote goods, works and services on the market;
- 4) to appeal to Roskomnadzor or in court against unlawful acts or omissions of the Operator in the processing of his/her personal data.

1.8. Control over the fulfillment of the requirements of this Policy shall be exercised by the authorized person responsible for the organization of personal data processing at the Operator.

1.9. Responsibility for violation of the requirements of the legislation of the Russian Federation and local normative acts of LLC "Kotlin SK" in the field of processing and protection of personal data is determined in accordance with the legislation of the Russian Federation.

2. Purposes of personal data collection

2.1. The processing of personal data is limited to the achievement of specific, predetermined and legitimate purposes. Processing of personal data incompatible with the purposes of personal data collection is not allowed.

2.2. Only personal data that meet the purposes for which they are processed shall be processed.

2.3. Processing of personal data by the Operator is carried out for the following purposes:

- carrying out its activities in accordance with the Charter of LLC Kotlin SK, including:
 - (a) entering into and executing contracts with counterparties;
 - (b) provision and personalization of the Operator's services;
 - (c) handling appeals and requests of personal data subjects;
 - (d) contacting personal data subjects with marketing materials and offers on services and products offered by the Operator (except for cases when the personal data subject refuses to receive marketing materials or when it is prohibited by law on any other grounds);
- implementation of access control.

3. Legal basis for personal data processing

3.1. The legal basis for personal data processing is a set of regulatory legal acts, pursuant to which and in accordance with which the Operator processes personal data, including:

- Constitution of the Russian Federation;
- Civil Code of the Russian Federation;

Federal law "On Information, information technologies и о protection of information" of 27.07.2006 N 149-FZ

- other regulatory normative legal acts, regulating relations, related related to the Operator's activities.

3.2. The legal basis for the processing of personal data is also:

- the charter of LLC Kotlin SK;
- contracts concluded between the Operator and personal data subjects;

- consent of personal data subjects to the processing of their personal data, when such consent is mandatory.

4. Scope and categories of processed personal data, categories of personal data subjects

4.1. The content and scope of the processed personal data shall comply with the stated purposes of processing provided for in Section 2 of this Policy. 2 of this Policy. Processed personal data shall not be redundant in relation to the stated purposes of their processing.

4.2. Personal data of the subjects include: surname,
first name, patronymics
e-mail address
phone numbers
details of the identity document

5. Procedure and conditions of personal data processing

5.1. Processing of personal data is carried out by the Operator in accordance with the requirements of the legislation of the Russian Federation.

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

5.3. The Operator carries out automated processing of personal data with the receipt of and/or transmission received information via information and telecommunication networks or without it.

5.4. The Operator's employees whose job description includes personal data processing are allowed to process personal data.

5.5. It is not allowed to disclose to third parties and disseminate personal data without the consent of the subject of personal data, unless otherwise provided for by federal law. Consent to the processing of personal data authorized by the subject of personal data for dissemination shall be executed separately from other consents of the subject of personal data to the processing of his/her personal data.

5.6. The transfer of personal data to the bodies of inquiry and investigation, the Federal Tax Service, the Social Fund of Russia and other authorized executive authorities and organizations is carried out in accordance with the requirements of the legislation of the Russian Federation.

5.7. The Operator shall take the necessary legal, organizational and technical measures to protect personal data from unlawful or accidental access, destruction, modification, blocking, dissemination and other unauthorized actions, including:

- identifies security threats to personal data during its processing;
- adopts local normative acts and other documents regulating relations in the field of personal data processing and protection;
- appoints persons responsible for ensuring personal data security in the structural subdivisions and information systems of the Operator;

- creates the necessary conditions for working with personal data;
- organizes accounting of documents containing personal data;
- organizes work c information systems, B in which personal data are 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 data.

5.9. The Operator shall store personal data in a form that allows to identify the subject of personal data for no longer than required by each purpose of personal data processing, unless the period of personal data storage is established by federal law, contract.

5.9.1. Personal data on paper media are stored in LLC "Kotlin SK" during the storage periods of documents for which these periods are provided by the legislation on archiving in the Russian Federation.

5.9.2. The storage period of personal data processed in personal data information systems corresponds to the storage period of personal data on paper.

5.10. The Operator stops processing personal data in the following cases:

- the fact of their unauthorized processing has been revealed. Deadline - within three working days from the date of detection;
- the purpose of their processing has been achieved;
- the personal data subject's consent to the following actions has expired or been revoked processing of said data, when the Personal Data Law allows processing of such data only with consent.

5.11. When the purposes of personal data processing are achieved, as well as in case the subject of personal data withdraws his/her consent to their processing, the Operator shall cease processing of such data if:

- otherwise is not stipulated by the contract to which the personal data subject is a party, beneficiary or guarantor;
- The operator is not entitled to carry out processing without the consent of the subject of personal data.
data on the grounds stipulated by the Personal Data Law or other federal laws;
- otherwise not provided for by another agreement between the Operator and the subject of personal data.

5.12. If the personal data subject appeals to the Operator with a request to stop processing of personal data within a period not exceeding 10 working days from the date of receipt of the relevant request by the Operator, the processing of personal data shall be stopped, except for cases stipulated by the Personal Data Law. The said term may be extended, but not more than for five working days. For this purpose

The operator should send a motivated notice to the personal data subject indicating the reasons for extending the deadline.

5.13. When collecting personal data, including through the information and telecommunications network Internet, the Operator shall ensure 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 cases specified in the Law on Personal Data.

6. Updating, correction, deletion, destruction of personal data, responses to subject access requests personal data

6.1. Confirmation of the fact of personal data processing by the Operator, 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 shall be provided by the Operator to the personal data subject or his/her representative within 10 working days from the moment of application or receipt of the request of the personal data subject or his/her representative. This term may be extended, but not more than for five working days. For this purpose, the Operator should send a motivated notice to the personal data subject indicating the reasons for extending the term for providing the requested information.

The information provided shall not include personal data relating to other subjects of personal data, unless there are legitimate grounds for disclosure of such personal data.

The request must contain:

- number of the main identity document of the personal data subject or his/her representative, information on the date of issue of the said document and the issuing authority;
- information confirming the personal data subject's participation in relations with by the Operator (contract number, date of the contract, word designation and (or) other information), or information otherwise confirming the fact of personal data processing by the Operator;
- signature of the personal data subject or his/her representative.

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

The Operator provides the information specified in part 7 of Article 14 of the Law on Personal Data to the personal data subject or his/her representative in the form in which the respective appeal or request was sent, unless otherwise specified in the appeal or request.

If the appeal (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, a reasoned refusal shall be sent to him.

The right of the personal data subject to access his/her 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/her personal data violates the rights and legitimate interests of third parties.

6.2. In case inaccurate personal data is revealed upon application of a personal data subject or his/her 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 application or receipt of the said request for the period of verification, if blocking of personal data does not violate the rights and legitimate interests of the personal data subject or third parties.

If the fact of inaccuracy of personal data is confirmed, the Operator, based on the information submitted by the personal data subject or his/her representative or Roskomnadzor, or other necessary documents, shall clarify the personal data within seven working days from the date of submission of such information and remove the blocking of personal data.

6.3. In case of detection of unlawful processing of personal data upon application (request) of a personal data subject or his/her representative or Roskomnadzor, the Operator shall block the unlawfully processed personal data related to this personal data subject from the moment of such application or request.

6.4. If the Operator, Roskomnadzor or any other interested party reveals the fact of unlawful or accidental transfer (provision, dissemination) of personal data (access to personal data) resulting in violation of the rights of personal data subjects, the Operator shall:

- within 24 hours - notify Roskomnadzor of the incident, the alleged reasons that led to the violation of the rights of personal data subjects, the alleged harm caused to the rights of personal data subjects and the measures taken to eliminate the consequences of the incident, as well as provides information on the person authorized by the Operator to interact with Roskomnadzor on issues related to the incident;
- within 72 hours - notifies Roskomnadzor of results internal investigate the identified incident and provide information on the persons whose actions caused the incident (if any).

6.5. Procedure for destruction of personal data by the Operator.

6.5.1. Conditions and terms of destruction of personal data by the Operator:

- achievement of the purpose of personal data processing or loss of necessity to achieve this purpose - within 30 days;
- achieving the maximum retention period for documents containing personal data - within 30 days;
- provision by the personal data subject (his/her representative) of the confirmation of if the personal data was obtained unlawfully or is not necessary for the stated purpose of processing - within seven working days;
- revocation by the subject of personal data of his/her consent to the processing of his/her personal data if their retention is no longer required for the purpose of their processing - within 30 days.

6.5.2. When the purpose of personal data processing is achieved, as well as in case the subject of personal data withdraws consent to their processing, personal data shall be destroyed if:

- otherwise is not stipulated by the contract to which the personal data subject is a party, beneficiary or guarantor;
- the operator is not entitled to carry out processing without the consent of the personal data subject data on the grounds stipulated by the Personal Data Law or other federal laws;
- otherwise not provided for otherwise agreement between Operator и the subject of personal data.

6.5.3. Destruction of personal data is carried out by a commission established by the order of the General Director of LLC Kotlin SK.

6.5.4. Ways destruction personal data data are established в local regulatory acts of the Operator.

7. Final provisions

7.1. The User may obtain any clarifications on the issues of interest regarding the processing of his/her personal data by contacting the Operator via e-mail at office@kotlin-sc.ru.

12.2. This document will reflect any changes to the Operator's personal data processing policy. The Policy is valid indefinitely until it is replaced by a new version.

12.3. The current version of the Policy is freely available on the Internet at <https://www.kotlin-sc.ru/>.