

Attachment 1

AUTHORIZED

By the order of Director General of the
Association

#1-PD dated April 23, 2015

STATEMENT

ABOUT PROTECTION OF PERSONAL DATA

1. General provisions

1. The present Statement has been created to protect personal data of employees of the Association and personal data of other persons, that are subject to processing at the Association, (hereinafter jointly referred to as “persons”) from unauthorized access, misuse or loss of the data, to define the rules of processing the personal data and to define the confidentiality guarantee for the data about persons provided to the Association.
2. The Statement has been created in accordance with the Constitution of the Russian Federation, the Labor Code of the Russian Federation, the Administrative Offense Code of the Russian Federation, the Civil Code of the Russian Federation, the Criminal Code of the Russian Federation, the Federal Law of the Russian Federation dated July 27, 2006 #149-FZ “About information, information technologies and information protection”, the Federal Law of the Russian Federation dated July 27, 2006 #152-FZ “About personal data”.
3. Personal data are classified as confidential information. The non-disclosure mode of personal data shall be released in case of depersonalization or upon 75 years of keeping unless the law of the Russian Federation stipulates otherwise.
4. General definitions used in the Statement are the following:
personal data of a person – any information which is related to a definite or a defined person, directly or indirectly, – an employee (the subject of personal data);
processing of personal data of a person – any action (an operation) or a range of actions (operations) carried out regarding the personal data with the use of automation tools or without the use of such tools, including compiling, recording, filing, accumulation, keeping, correction (updating, changing), extraction, use, transfer (dissemination, providing, access), depersonalization, freezing, deleting, destroying of personal data;
5. The present Statement is authorized and enacted by the order of Director General and is mandatory for all employees who have access to personal data. The Statement shall be valid for an indefinite period till a new Statement is authorized and enacted.
6. Amendments to the present Statement shall be authorized by Director General of the Association.

II. Scope of personal data

1. Personal data of persons comprise any information related to a definite employee or an employee defined based on the information, including a person's family name, a name, a patronymic name, the year, the month, the date and the place of birth, the address, one's family, social and material status, education, profession, income and other information required for the Association due to employment, civil and other matters.
2. The scope of personal data of persons is the following:
 - a questionnaire;
 - an autobiography;
 - education;
 - data related to employment and total years of service;
 - data related to previous employment;
 - data related to family members;
 - passport data;
 - data about military service;
 - data about an employee's salary;
 - data about social benefits;
 - profession;
 - current working position;
 - rate of wages;
 - prior criminal convictions;
 - the address;
 - e-mail address;
 - landline and cell phone;
 - contents of the labor, civil agreement;
 - contents of declaration to be submitted to tax bodies;
 - original papers and copies of personnel orders;
 - personal files and labor books of employees;
 - data referred to as grounds for personnel orders;
 - files containing information related to advanced training and retraining of employees, their performance reviews and in-house investigations;
 - copies of reports submitted to statistical authorities;
 - copies of documents confirming education;
 - results of medical examination to check if a person is able to perform duties;
 - photos and other data related to personal data of an employee;
 - files containing materials related to assessment and/or performance results of employees, in-house investigations;
 - the personnel-related pool of reference data (catalogues, journals);
 - recommendations, testimonials and other.
3. The data indicated in clause 2 of this part are deemed classified and are not subject to disclosure except for grounds stipulated in the law of the Russian Federation.

III. Creation, processing and keeping of personal data.

1. Creation of personal data of a person.

Documents that comprise personal data are created by the following means:

- a) Copying the original papers (documents about education, TIN certificate, pension certificate);
- b) Filling in the registration forms with the data (in print format and electronic form);
- c) Obtaining the original papers of necessary documents (a labor book, a personal data sheet, an autobiography, a medical review sheet);
- d) Submitting of personal data by a person on internet portals that belong to the Association or providing the personal data to the Association by e-mail or by other means.

2. Processing of personal data.

2.1. The provisions of the Constitution of the Russian Federation, the Labor Code of the Russian Federation and other federal laws should be strictly taken into consideration in order to protect personal data and to ensure rights and freedoms of a person and a citizen during processing of personal data and defining the volume and contents of the processed personal data.

2.2. Processing of personal data is carried out for the following purposes:

- a) to ensure that requirements of the law of the Russian Federation and internal documents of the Association are met;
- b) to secure personal safety of the persons;
- c) to ensure the property of the persons and the Association is intact.

2.3. All personal data should be obtained from the person of interest but for the cases when it becomes possible to obtain the data only from a third party.

2.4. It is possible to obtain personal data from a third party only in case the person has been informed about it in advance and the person's written consent has been received.

The following information should be included in the notification letter to inform the person about obtaining his or her personal information from a third party:

- a) about purposes related to obtaining the personal data;
- b) about probable sources and methods for obtaining the personal data;
- c) about the nature of the personal data that should be obtained;
- d) about consequences following the person's refusal to provide a written consent for obtaining the personal data.

2.5. The Association is not entitled to obtain and process personal data about the person's political, religious and other beliefs, about one's private life and personal data of the person related to his or her memberships in public associations or union activity, except for cases stipulated in the federal law.

2.6. When interests of the person are affected while decisions are made the Association is not entitled to apply personal data of the person which were obtained entirely as a result of their automatic processing or by electronic means.

2.7. Employees and their representatives should read the documents of the Association and acknowledge them in writing in reference to the documents that establish the way of processing of employees' personal data as well as their rights and obligations in this field.

3. Information related to personal data of the employee is included in his or her personal file, the sheet #T-2 and saved in electronic format with the access to it to be granted to persons who use personal data of the employee for work-related purposes.

4. Keeping of personal data at the accounting department:

- a) Personal data in written format are kept in a locked filing cabinet;
 - b) Personal data in electronic format are kept on a disc of a personal computer of the designated official at the accounting department.
5. Personal data included in the personal files are kept in a locked filing cabinet which is placed at the working area of the designated official who works with personnel records. Personal data in electronic format are kept on a disc of a personal computer of the designated official who works with personnel records.
 6. A labor book, military service records and a personal sheet #T-2 are kept in a locked metal safe.
 7. Consent of persons to process personal data is not necessary in cases stipulated in the law of the Russian Federation.

IV. Transfer and keeping of personal data.

1. During the transfer of personal data of persons the Association should meet the following requirements:
 - not to share personal data of a person with a third party without his or her written consent except for the cases when it is necessary in order to prevent threat to life and health of the person and in other cases stipulated in the Labor Code of the Russian Federation or other federal laws;
 - not to share personal data of a person for commercial purposes without the person's written consent;
 - to inform a third party that obtains personal data of a person that the data can be used only for the purposes they are provided for, and to request confirmation from the third party that the requirement is met. A third party that receives the personal data is obliged to act in compliance with confidentiality agreement. This provision does not cover exchange of personal data of employees which is in accordance with the procedure stipulated in the Labor Code of the Russian Federation and other federal laws;
 - to transfer personal data of an employee within the Association in accordance with the local regulation act the employee should be aware of and acknowledge in writing;
 - to grant the access to personal data of persons only for designated officials while the officials should be entitled to obtain only the personal data of persons necessary for fulfilling certain functions;
 - not to request information related to health condition of persons except for data related to possibility for the employee to fulfill his or her duties at work;
 - to transfer personal data to representatives of employees following the procedure stipulated in the Labor Code of the Russian Federation and other federal laws, and to limit the scope of presented information to the amount necessary for the representatives to fulfill their functions.
2. Personal data of persons are processed by the Association and kept in the archive of the Association and/or in the automated records system on dedicated servers of the Association.
3. Personal data of employees can be obtained, further processed and transferred for keeping both in paper format and electronic format using the local computer network and/or a specialized computer program.

4. When personal data are received not from the employee (except for the cases when personal data were presented to Employer according to the law of the Russian Federation or in case the personal data are available for public) before processing of the personal data Employer should provide the employee with the following information:
 - the name (family name, name, patronymic name) and address of the operator or the representative;
 - the purpose of processing of the personal data and its legal grounds;
 - information related to potential users of the personal data;
 - clarification of rights of the subject of the personal data indicated by the law of the Russian Federation and internal documents of the Association.

V. Access to personal data

1. The following people are granted internal access to personal data of persons (related only to personal data which are necessary to fulfill certain working functions):
 - Director General of the Association; the person who is in charge of accounting, tax and personnel records keeping – the access is granted to all the personal data of persons;
 - employees of the archive and administrators of the automated records system for personal data – the access is granted to the data of employees (both resigned and employed) that are kept in the archive and/or in the automated records system of the Association;
 - other officials can get access only to the personal data which are necessary to perform their working functions according to their written request with indication of the purpose for using the requested personal data.
- 1.1 An employee or other person whose personal data the Association has is entitled to the following:
 - to get access to his or her personal data and learn them, including the right to get copies;
 - to demand from the Association to clarify, delete or correct incomplete, false, outdated, invalid and illegally obtained data, or the data which are unnecessary for the Association;
 - to get the following information from the Association: information about persons who have access to personal data or who can be granted the access; a list of processed personal data and their source; terms of processing of personal data including terms of their keeping; information related to legal consequences for the subject of the personal data the processing of the personal data might cause;
 - to demand from the Association to inform all the persons who were provided false or incomplete personal data about any exceptions, corrections or additions;
 - to file a complaint to an authorized body on rights protection of subjects of personal data or to appeal to the court of law regarding unlawful actions or lack of actions at the Association while processing and protecting the person's personal data.
2. External access to personal data is possible in cases stipulated in the law of the Russian Federation.

VI. Protection of personal data

1. Threat and risk of losing personal data are identified as single or complex, real or potential, active or passive malicious possibilities of external or internal sources of threat to create unfavorable events and to cause destabilizing impact on protected information.
2. The risk of threat for any information resources is created by natural disasters, extreme situations, terrorist activities, failures of technical devices and communications lines, other objective circumstances and persons who are interested or not interested in such a threat to appear.
3. Protection of personal data is considered to be the regulated and dynamic technological process which prevents violation of access, integrity, accuracy and confidentiality of personal data and which eventually provides sufficient safety for the information during operational and production activity of the Association.
4. The following measures should be taken in order to protect personal data of persons:
 - limitation and regulation of the group of employees who need access to personal data of employees due to their working functions;
 - rational layout of working places of employees when uncontrollable use of information is impossible;
 - necessary conditions available in the premises to work with information related to personal data;
 - timely detecting of violations related to regulations for personal data protection;
 - educational and explanatory activities for employees with the purpose to prevent loss of information during their work with documents including personal data;
 - other measures which are stipulated in the law of the Russian Federation and internal documents of the Association.

It is not allowed for personal files of employees to be considered at working places of the managers. Personal files can be delivered to working places only for Director General, officials responsible for accounting and personnel records in the Association, and in exceptional circumstances can they be provided for the head of a division upon written permission from Director General (for instance, during the process to prepare material for the employee's performance review).

5. All the persons connected with obtaining, processing and protection of personal data should sign the agreement of non-disclosure of personal data of employees.
6. If applicable the personal data shall be depersonalized.
7. In addition to measures related to protection of personal data which are stipulated in the law of the Russian Federation, the Association, employees and their representatives and other persons whose personal data are processed in the Association can develop joint measures for protection of personal data of employees.

VII. Accountability for violation of norms which regulate the processing and protection of personal data

1. Employees of the Association found guilty of violations of norms regulating obtaining, processing and protection of personal data in the Association are subject to disciplinary, administrative, civil or criminal liability in accordance with the law of the Russian Federation.