

## Personal data processing policy

### 1. General terms

1.1. The present policy of personal data processing is made according to requirements of the Federal law from 27.07.2006. No. 152-FZ "On Personal Data" and determines the procedure for processing personal data and measures to ensure the safety of personal data of the Autonomous Non-Commercial Organization "International and Comparative Law Research Center" (hereinafter – "**Operator**").

1.2. The Operator sets as its most important goal and condition for the performance of its activities the observance of human and citizen's rights and freedoms during the processing of its personal data, including the protection of rights to privacy, personal and family secrets.

1.3. This Operator's policy regarding the processing of personal data (hereinafter – "**Policy**") applies to all information that the Operator may receive about visitors of the website located in the domain name iclrc.ru (and its third-level domains).

### 2. The basic concepts used in the Policy

2.1. Automated processing of personal data — processing of personal data by means of computer technology.

2.2. Blocking of personal data — temporary termination of processing of personal data (except for cases when processing is necessary for specification of personal data).

2.3. Website — a set of graphic and information materials, as well as programs for computers and databases, providing their availability on the Internet at the network address <http://iclrc.ru/> (and its third-level domains).

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

2.5. Depersonalization of personal data — actions, as a result of which it is impossible to determine the belonging of personal data to a particular User or other subject of personal data without using additional information.

2.6 Processing of personal data — any action (operation) or set of actions (operations) made with or without the use of automation means with personal data, including collection, recording, systematization, accumulation, storage, clarification (update,



change), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data.

2.7. The operator — a state body, municipal body, legal or physical person, independently or together with other persons organizing and (or) carrying out processing of the personal data, and also defining purposes of processing of the personal data, structure of the personal data which are subject to processing, actions (operations) made with the personal data.

2.8. Personal data — any information relating directly or indirectly to the User of the website located on the domain name iclrc.ru (and its third-level domains).

2.9. The User — any visitor of the website located on the domain name iclrc.ru (and its third level domains).

2.10. Providing personal data — actions aimed at disclosure of personal data to a certain person or a certain circle of persons.

2.11. Dissemination of the personal data — any actions directed on disclosing of the personal data to an uncertain circle of persons (transfer of the personal data) or on familiarization with the personal data of an unlimited circle of persons, including disclosing of the personal data in mass media, placing in information-telecommunication networks or granting of access to the personal data in any other way.

2.12. Cross-border transfer of personal data — transfer of personal data to the territory of a foreign state to a foreign authority, foreign physical or foreign legal entity.

2.13. Destruction of personal data — any actions as a result of which the personal data are irrevocably destroyed with impossibility of the further restoration of the maintenance of the personal data in information system of the personal data and (or) as a result of which material carriers of the personal data are destroyed.

### **3. The personal data of the User processed by the Operator**

3.1 Name, surname, patronymic; e-mail address; telephone numbers; information about education, profession, specialty and qualification, details of educational documents.

3.2 The website also collects and processes impersonal data about visitors (including cookies) using Internet statistics services (Yandex Metrics, Google Analytics and others).



#### **4. Purposes of personal data processing**

4.1 The purpose of processing the User's personal data is to inform the User by sending e-mails; provide the User with access to the services, information and/or materials contained on the Website.

4.2 The Operator is also entitled to send the User notifications about new products and services, special offers and various events. The User can always refuse to receive information messages by sending a letter to the Operator at [info@iclr.ru](mailto:info@iclr.ru) with the note "Refusal of notifications".

4.3. Depersonalized Personal data of the Users collected by means of the Internet statistics services are used to collect information about the Users' actions on the website, to improve the quality of the website and its content.

#### **5. Legal grounds for processing personal data**

5.1 The Operator processes the personal data of the User only in case of filling in special forms located on the website and/or sending the personal data by the User himself. By filling in the corresponding forms and/or sending the personal data to the Operator, the User expresses his consent to this Policy.

5.2 The Operator processes the depersonalized personal data about the User in case it is allowed in the settings of the User's browser (the saving of the "cookies" and the use of JavaScript technology are enabled).

#### **6. The procedure of collection, storage, transfer and other types of processing of personal data**

6.1. Safety of the personal data which are processed by the Operator, is provided by realization of the legal, organizational and technical measures necessary for performance in full of requirements of the current legislation in the field of protection of the personal data.

6.2. The Operator ensures safety of personal data and takes all possible measures to exclude access to personal data of unauthorized persons.

6.3 The User's personal data will never, under any circumstances, be communicated to third parties, except in cases related to the implementation of the applicable law.



6.4. In case of revealing the inaccuracies in the personal data, the User can update them independently, by sending a notice to the Operator's e-mail address [info@iclr.ru](mailto:info@iclr.ru) with the note "Updating of personal data".

6.5 The term of personal data processing is unlimited. The user can at any moment revoke his consent to the processing of personal data by sending a notice to the Operator by e-mail to the Operator's e-mail address [info@iclr.ru](mailto:info@iclr.ru) with the note "Revocation of consent to the processing of personal data".

## **7. Cross-border transfer of personal data**

7.1. The operator before the beginning of realization of transboundary transfer of the personal data is obliged to be convinced that the foreign state on which territory it is supposed to carry out transfer of the personal data, provides reliable protection of the rights of subjects of the personal data.

7.2. Cross-border transfer of the personal data in territory of the foreign states which do not meet above-stated requirements, can be carried out only in case of the consent in writing of the subject of the personal data on cross-border transfer of its personal data and/or execution of the contract, the party of which is the subject of the personal data.

## **8. Final provisions**

8.1. The User can get any explanations on the questions concerning the processing of his personal data by contacting the Operator by e-mail [info@iclr.ru](mailto:info@iclr.ru).

8.2 This document will reflect any changes in the policy of personal data processing by the Operator. The policy is valid indefinitely until it is replaced by a new version.

8.3 The current version of the Policy is freely available on the Internet at [http://iclr.ru/ICLRC\\_pd\\_policy.pdf](http://iclr.ru/ICLRC_pd_policy.pdf).

