

Personal data processing policy of Security Intelligence LLC.

The document contains the main approaches to the processing of personal data at Security Intelligence LLC.

General provisions

This document (hereinafter referred to as the Policy) defines the goals and general principles of processing personal data, as well as the implemented measures to protect personal data in Intellectual Security LLC (hereinafter referred to as the Operator). The Policy is a public document of the Operator and provides for the possibility of familiarization with it by any person.

The policy is valid indefinitely after approval until it is replaced by a new version.

The Policy uses terms and definitions in accordance with their meanings, as defined in Federal Law No. 152 "On Personal Data".

The processing of the Operator's personal data is carried out in compliance with the principles and conditions provided for by this Policy and the legislation of the Russian Federation in the field of personal data.

Purposes of collecting personal data

Personal data that is redundant or incompatible with the following main purposes is not processed:

- conclusion, execution and termination of civil contracts with individuals, legal entities and other persons, in cases provided for by the current legislation of the Russian Federation and the Operator's Charter;
- provision of information of a notification or marketing nature, including information about services, ongoing promotions, events (for which the client has prior consent to receive them);
- carrying out activities to resolve applications, claims, customer communications regarding quality of service, provision of products, and activities of sales channels;
- regulation of labor (civil law) relations between the subject and the Operator (ensuring compliance with laws and other regulations, assisting employees in employment, training and promotion, ensuring the personal safety of employees, monitoring the quantity and quality of work performed and ensuring the safety of property);
- ensuring access control on the Operator's territory.

Legal grounds for processing personal data

The processing of personal data is carried out by the Operator on a legal and fair basis, based on the following documents:

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

- Civil Code of the Russian Federation;
- Tax Code of the Russian Federation;
- Federal Law of July 27, 2006. No. 152-FZ "On Personal Data";
- Federal Law of 04/06/2011. No. 63-FZ "On Electronic Signature";
- Federal Law of 05/04/2011. No. 99-FZ "On licensing of certain types of activities";
- Federal Law of July 7, 2003. No. 126-FZ "On Communications";
- Federal Law of 04/01/1996. No. 27-FZ "On individual (personalized) registration in the compulsory pension insurance system";
- Federal Law of October 22, 2004. No. 125-FZ "On archiving in the Russian Federation";
- Federal Law "On Education in the Russian Federation" dated December 29, 2012 N 273-FZ current;
- Charter of Security Intelligence LLC.

Volume and categories of personal data processed, categories of personal data subjects

The content and scope of personal data processed are determined in accordance with the purposes of processing. The main categories of personal data subjects whose data is processed by the Operator include:

- individuals who are in labor and civil relations with the Operator;
- individuals who are in labor and civil relations with the Operator's counterparties;
- candidates for vacant positions;
- individuals contacting the company in order to receive advice using the means of communication provided by the Operator.

For individuals who have labor and civil relations with the Operator and candidates for vacant positions, the following can be processed:

- last name, first name, patronymic (including previous last names, first names and (or) patronymics, if they are changed);
- year, month, date of birth;
- information about citizenship;
- type, series, number of the identity document, name of the authority that issued it, date of issue;
- address of residence (address of registration, actual residence);
- family status;
- contact phone number or information about other methods of communication;

- details of the state pension insurance certificate;
- taxpayer identification number;
- details of the compulsory medical insurance policy;
- details of the certificate of state registration of acts of civil status;
- information about work activity;
- information about military registration and details of military registration documents;
- information about education, including postgraduate professional education (name and year of graduation from the educational institution, name and details of the education document, qualifications, specialty according to the education document);
- information about the academic degree;
- information about income;
- other information provided for by standard forms and established processing procedures.

For individuals who have labor and civil relations with the Operator's counterparties, the following can be processed:

- full name;
- year, month, date of birth;
- information about citizenship;
- type, series, number of the identity document, name of the authority that issued it, date of issue;
- address of residence (address of registration, actual residence);
- contact phone number or information about other methods of communication;
- information about work activity;
- other information provided for by standard forms and established processing procedures.

For individuals contacting the company for advice using communication tools provided by the Operator can be processed:

- full name;
- contact phone number or information about other methods of communication;
- other information provided for in standard forms.

Procedure and conditions for processing personal data

The processing of personal data by the Operator is carried out in a mixed way, i.e. occurs both with the use of automation tools and without them. The following actions are carried out with personal data: collection, recording, systematization, accumulation, storage, clarification (updating, changing), extraction, use, transfer, provision, access), depersonalization, blocking, deletion, destruction of personal data.

During processing, the accuracy, sufficiency and relevance of personal data in relation to the purposes of their processing are ensured. If inaccurate or incomplete personal data is detected, it is updated.

Receipt and processing of personal data in cases provided for by Federal Law-152 is carried out by the Operator with the written consent of the subject of personal data. Consent in the form of an electronic document signed with a qualified electronic signature is equivalent to consent in writing on paper containing the handwritten signature of the subject of personal data.

Consent to the processing of personal data can be given by the subject of personal data or his representative in any form that allows confirmation of the fact of its receipt, unless otherwise established by Federal Law-152.

The Processing of special categories of personal data relating to race, nationality, political views, religious or philosophical beliefs, intimate life is not carried out by the Operator.

Information that characterizes the physiological characteristics of a person and on the basis of which his identity can be established (biometric personal data) can only be processed with written consent of the subject of personal data.

The processing and storage of personal data is carried out no longer than required by the purposes of processing personal data, unless there are legal grounds for further processing. Processed personal data is subject to destruction or depersonalization when the following conditions occur:

- achieving the purposes of processing personal data or maximum storage periods - within 30 days;
- loss of the need to achieve the purposes of processing personal data – within 30 days;
- provision by the subject of personal data or his legal representative of confirmation that the personal data was illegally obtained or is not necessary for the stated purpose of processing - within 7 days; • impossibility of ensuring the legality of the processing of personal data - within 10 days;
- withdrawal by the subject of personal data of consent to the processing of personal data, if the storage of personal data is no longer required for the purposes of processing personal data - within 30 days;
- withdrawal by the subject of personal data of consent to the use of personal data for contacts with potential consumers when promoting goods and services - within 1 day after receiving the corresponding request;
- expiration of the statute of limitations for legal relations within the framework of which the processing of personal data is or was carried out; • liquidation (reorganization) of the Operator.

Processing of personal data on the basis of contracts and other agreements of the Operator, instructions to the Operator and instructions of the Operator for the processing of personal data is carried out in accordance with the terms of these contracts, agreements and instructions. The above documents may specify, in particular:

- goals, conditions, terms for processing personal data;
- obligations of the parties, including measures to ensure the security of personal data;
- rights, obligations and responsibilities of the parties regarding the processing of personal data.

In cases not expressly provided for by applicable law or contract, processing is carried out after obtaining the consent of the subject of personal data. Consent can be expressed in the form of taking actions, accepting the terms of the offer agreement, putting appropriate marks, filling out fields in forms, blanks, or in writing in accordance with the law.

The operator takes the necessary legal, organizational and technical measures to ensure the security of personal data, their protection from unauthorized (including accidental) access, destruction, modification, blocking of access and other unauthorized actions. Such measures, in particular, include:

- appointment of employees responsible for organizing the processing and ensuring the security of personal data;
- checking the availability of contracts and, if necessary, including in contracts clauses on ensuring the confidentiality of personal data;
- publication of local regulations on the processing of personal data, familiarization of employees with them, training of users;
- ensuring physical security of premises and processing facilities, access control, security, video surveillance;
- restriction and delimitation of access of employees and other persons to personal data and processing means, monitoring of actions with personal data;
- identification of threats to the security of personal data during their processing, generation of threat models based on them;
- use of security tools (anti-virus tools, firewalls, protection against unauthorized access, cryptographic information protection tools), including those that have passed the conformity assessment procedure in the prescribed manner; • accounting and storage of information media, excluding their theft, substitution, unauthorized copying and destruction;
- backup of information for recovery;
- carrying out internal control over compliance with the established procedure, checking the effectiveness of measures taken, responding to incidents

The subject of personal data has the right to withdraw consent to the processing of personal data by sending a corresponding request to the Operator by mail or by contacting in person.

The subject of personal data has the right to receive information regarding the processing of his personal data, including containing:

- confirmation of the fact of processing of personal data by the Operator;
- legal grounds and purposes of processing personal data;
- the purposes and methods of processing personal data used by the Operator;

- name and location of the Operator, information about persons (except for the Operator's employees) who have access to personal data or to whom personal data may be disclosed on the basis of an agreement with the Operator or on the basis of federal law;
- processed personal data related to the relevant subject of personal data, the source of their receipt, unless a different procedure for the presentation of such data is provided for by federal law;
- terms of processing of personal data, including periods of their storage;
- the procedure for the exercise by the subject of personal data of the rights provided for by the Federal Law "On Personal Data";
- information about completed or intended cross-border data transfers;
- name or surname, first name, patronymic and address of the person processing personal data on behalf of the Operator, if the processing has been or will be assigned to such a person; • other information provided for by the Federal Law "On Personal Data" or other federal laws.

The subject of personal data has the right to demand from the Operator clarification of his personal data, blocking or destruction of it if the personal data is incomplete, outdated, inaccurate, illegally obtained or is not necessary for the stated purpose of processing, as well as take measures provided by law to protect his rights .

If the subject of personal data believes that the Operator is processing his personal data in violation of the requirements of the Federal Law "On Personal Data" or otherwise violates his rights and freedoms, the subject of personal data has the right to appeal the actions or inaction of the Operator to the authorized body for the protection of the rights of personal data subjects (Federal Service for Supervision of Communications, Information Technologies and Mass Communications - Roskomnadzor) or in court.

The subject of personal data has the right to protect his rights and legitimate interests, including compensation for losses and (or) compensation for moral damage in court.Права и обязанности Оператора

The rights and obligations of the Operator are determined by current legislation and agreements of the Operator. Control of compliance with the requirements of this Policy is carried out by the person responsible for organizing the processing of personal data and the Information Security Department of the Operator within the limits of their powers.

The responsibility of persons involved in the processing of personal data on the basis of instructions from the Operator for the unlawful use of personal data is established in accordance with the terms of a civil law agreement or an Information Confidentiality Agreement concluded between the Operator and the counterparty.

Persons guilty of violating the rules governing the processing and protection of personal data bear material, disciplinary, administrative, civil or criminal liability in the manner established by federal laws, local acts, and agreements of the Operator.

The personal data processing policy is developed by the person responsible for organizing the processing of personal data and is put into effect after approval by the head of the Operator.

Suggestions and comments for making changes to the Policy should be sent to info@securityvision.ru.

The policy is reviewed annually to keep it current and updated as necessary.