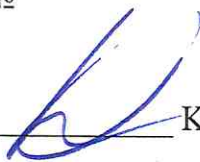


APPROVED BY  
by order of ANO HE "Innopolis University"  
from №  
Director

  
\_\_\_\_\_ K.V. Semenikhin

**Personal data processing policy  
of autonomous non-profit organization of higher education  
"Innopolis University"**

## 1. General Provisions

1.1. This Policy for the processing of personal data of the autonomous non-profit organization of higher education "Innopolis University" (hereinafter - the Policy) defines the basic principles and conditions for the processing of personal data (hereinafter - PD) in ANO HE "Innopolis University" (hereinafter - the University), as well as measures to ensure PD security at the University.

1.2. This Policy is a fundamental regulatory document that defines the principles of processing and protection of personal data of users processed by the operator using information and telecommunication networks, defines the purposes, legal grounds, procedure and volume of processed personal data of users; contains information about the implemented requirements for the protection of processed personal data; determines the order of interaction with PD subjects upon receipt of requests from them.

1.3. This Policy has been developed in accordance with the requirements of the Federal Law of the RF of July 27, 2006 №152-FL "On Personal Data" (hereinafter referred to as the Law on Personal Data), other federal laws governing the processing of personal data, as well as those adopted in the execution of by-laws acts of the Russian Federation.

1.4. This Policy is binding on all employees and structural units of the University that process PD.

1.5. This Policy is binding on all PD, both processed without the use of automation tools, and during their processing in personal data information systems (hereinafter - PDIS), including, but not limited to: Internet sites at addresses: innopolis.university, university.innopolis.ru, all subdomains of these sites, other sites of the University, internal PDIS marked in the register of PD operators of the Federal Service for Supervision of Communications, Information Technology and Mass Media (Roskomnadzor).

1.6. The version of the Policy, published on the corporate website of the University in the information and telecommunication network "Internet" at the address: Innopolis.university, is considered relevant.

1.7. By giving consent to the processing of PD, the PD subject agrees to the terms of processing and protection of PD specified in this Policy.

## 2. Basic terms and definitions

2.1. This Policy uses terms with the appropriate definitions:

2.1.1. **Automated processing of personal data** - is processing of personal data using computer technology.

2.1.2. **Biometric personal data** - is information that characterizes the physiological and biological characteristics of a person, on the basis of which it is possible to establish his identity and which is used by the operator to establish the identity of the subject of personal data.

2.1.3. **Blocking of personal data** is a temporary suspension of the processing of personal data (unless the processing is necessary to clarify personal data).

2.1.4. **Personal data information system** - is a set of personal data contained in databases and providing their processing of information technologies and technical means.

2.1.5. **Confidentiality of personal data** is a mandatory requirement for the operator and other persons who have gained access to personal data not to transfer personal data to third parties without the consent of the subject of personal data or other legal basis.

2.1.6. **Responsible for organizing the processing of personal data in an organization** - is an employee of the University appointed by the order of the director of

the organization, who is responsible for compliance by the organization and its employees with the legislation of the Russian Federation on personal data, including the requirements for the protection of personal data.

2.1.7. **Unauthorized access** - is access to information, IT systems and components of the IT infrastructure of persons who do not have the right to do so, in violation of the rules for differentiating access, but using standard means provided by computer technology or information system.

2.1.8. **Personal data operator** - is a state body, municipal body, legal entity or individual, independently or jointly with other persons organizing and (or) processing personal data, as well as determining the purposes of processing personal data, the composition of personal data to be processed, actions (operations) committed with personal data.

2.1.9. **Depersonalization of personal data** - are actions as a result of which it becomes impossible to determine the ownership of personal data to a specific subject of personal data without using additional information.

2.1.10. **Processing of personal data** - is any action (operation) or a set of actions (operations) performed using automation tools or without using such tools 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.

2.1.11. **Personal data** - is any information relating directly or indirectly to a specific or identifiable individual (subject of personal data).

2.1.12. **Provision of personal data** - are actions aimed at disclosing personal data to a certain person or a certain circle of persons.

2.1.13. **Dissemination of personal data** - are actions aimed at disclosing personal data to an indefinite circle of persons.

2.1.14. **Special categories of personal data** - is personal data related to race, nationality, political views, religious or philosophical beliefs, health status, intimate life, convictions.

2.1.15. **Structural subdivision** - is a subdivision of the University that is the executor of certain processes, functions, works, participates in the economic activities of the University, but does not have economic independence within the framework of the University.

2.1.16. **Personal data subject** is an individual who is directly or indirectly defined or determined using personal data.

2.1.17. **Cross-border transfer of personal data** - is the transfer of personal data to the territory of a foreign state to the authority of a foreign state, to a foreign individual or legal entity.

2.1.18. **Third parties** - are any individuals who are not employees of the University, any legal entities, their associations, officials, state and local authorities, other persons with whom the University enters into any legal relationship.

2.1.19. **Destruction of personal data** - are actions as a result of which it becomes impossible to restore the content of personal data in the information system of personal data and (or) as a result of which material carriers of personal data are destroyed.

### 3. Basic principles of personal data processing

3.1. The University, being a PD operator in accordance with the provisions of the Law on Personal Data, ensures compliance with the following principles of PD processing in its activities:

3.1.1. PD processing is carried out on a legal and fair basis.

3.1.2. PD processing is limited to the achievement of specific, predetermined and legitimate goals. PD processing is not performed that is incompatible with the purposes of PD collection.

3.1.3. The unification of databases containing personal data, the processing of which is carried out for purposes incompatible with each other, is not made.

3.1.4. Only PDs that meet the purposes of their processing are processed.

3.1.5. The content and volume of processed personal data correspond to the stated purposes of processing. The processed PD are not redundant in relation to the stated purposes of their processing.

3.1.6. When processing PD, the accuracy of PD is ensured, their sufficiency, and, if necessary, relevance in relation to the purposes of PD processing. The University takes the necessary measures to remove or clarify incomplete or inaccurate PD.

3.1.7. The storage of PD is carried out in a form that makes it possible to determine the subject of PD, no longer than the purpose of processing the PD requires, if the storage period for PD is not established by federal law, an agreement to which, the beneficiary or guarantor, to which the subject of PD is. The processed PD is destroyed or depersonalized upon achievement of the processing goals or in case of loss of the need to achieve these goals, unless otherwise provided by federal law.

3.1.8. The University takes the necessary measures to ensure the safety of the processed PD.

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

4.1. PD processing by the University is carried out for the following purposes:

4.1.1. Organization of labor relations with the staff of the University. Systematization of personnel information, maintenance of personnel records management and archiving, compilation of directories and address books (paper and electronic), registration policies of mandatory and voluntary health insurance, benefits and other incentives University.

4.1.2. Interaction with banking and credit organizations both for processing salary accounts and for confirming (refuting) information provided by the subject to banking organizations.

4.1.3. Conclusion, execution and termination of civil contracts with individuals, legal entities, individual entrepreneurs and other persons, in cases stipulated by the current legislation and regulatory documents of the Operator.

4.1.4. Implementation of educational activities (for programs of higher education and additional professional and general education).

4.1.5. Assistance in the employment of students (graduates), identification of successful (talented) students in order to develop their professional skills, modernization of training programs, creation of distance learning programs.

4.1.6. Organization and holding of Olympiads in various areas of training, excursions and other educational and scientific events.

4.1.7. Organization and holding of mass events, conferences, seminars, business meetings and other events carried out by the University for its own needs, under a service agreement or on other legal grounds.

4.1.8. Collection of statistical information on the use of services and resources of the University in the information and telecommunications network "Internet".

4.1.9. Collection of authentication information to provide access to the information and telecommunications network "Internet" by the technical means of the University.

4.1.10. Provision of accommodation services in places of temporary residence.

4.1.11. Compliance with legal requirements for reporting to pension funds, social insurance funds and other state organizations.

4.1.12. Dissemination of information about the activities of the University, promotion of the services of the University, the formation of advertising content of the University and publications in the media and social networks.

4.1.13. Improving the quality of user service and modernizing the operator's Internet resources by processing requests and requests from the user.

4.1.14. Statistical and other studies based on anonymized information provided by the user.

4.1.15. Formation of statistical reporting and implementation of economic activities of the Organization.

4.1.16. Implementation of access and intra-facility regimes at the University.

4.1.17. Creation of personal user identifiers in order for the subject to gain access to the systems and services of the University.

5. The processing of personal data of the University is carried out on a legal and fair basis. The legal grounds for PD processing are:

5.1. Constitution of the Russian Federation.

5.2. Labor Code of the Russian Federation.

5.3. Tax Code of the Russian Federation.

5.4. Federal Law of the Russian Federation of December 6, 2011 № 402-FL "On Accounting".

5.5. Federal Law of the Russian Federation of October 22, 2004 № 125-FL "On archival affairs in the Russian Federation".

5.6. Federal Law of the Russian Federation of December 29, 2012 № 273-FL "On Education in the Russian Federation".

5.7. Federal Law of the Russian Federation of April 6, 2011 № 63-FL "On Electronic Digital Signatures".

5.8. Federal Law of the Russian Federation of April 1, 1996 № 27-FL "On individual (personified) accounting in the compulsory pension insurance system."

5.9. Federal Law of the Russian Federation of July 24, 2009 № 212-FL "On Insurance Contributions to the Pension Fund of the Russian Federation, the Social Insurance Fund of the Russian Federation, the Federal Fund of Compulsory Medical Insurance and Territorial Compulsory Medical Insurance Funds."

5.10. Resolution of the Government of the Russian Federation of October 9, 2015 №1085 "On approval of the Rules for the provision of hotel services in the Russian Federation."

5.11. Charter of ANO HE "Innopolis University".

5.12. Other regulatory documents, including local regulatory acts of the University, the action of which regulates the processing of personal data.

6.1. The main categories of PD subjects whose data is processed at the University are:

6.1.1. Individuals who are in labor and civil law relations with the University.

6.1.2. Individuals who are in labor and civil law relations with the counterparties of the University.

6.1.3. Individuals visiting the University's Internet resources, as well as using the University's Internet services.

6.1.4. Individuals to whom the University provides services in the framework of its economic activities.

6.1.5. Individuals visiting the territory of the University.

6.1.6. Individuals who are candidates for filling vacant positions.

6.1.7. Individuals who are students or applicants of the University, as well as those wishing to take specialized courses of the Organization.

6.1.8. Individuals representing the interests of persons who have not reached the age of majority, or who are unable to independently represent their interests at the University.

6.2. For the categories of PD subjects specified in clause 6.1. of this Policy, the following personal data is processed:

6.2.1. Full Name.

6.2.2. Details of the identity document.

6.2.3. A photograph of the subject that does not contain biometrics.

6.2.4. Information about education, courses of advanced training, additional specialized training.

6.2.5. Taxpayer identification number (TIN).

6.2.6. Insurance number of an individual personal account (INIPA).

6.2.7. Information about registration, place of actual residence.

6.2.8. Information about the marital status, the presence of children and dependents.

6.2.9. Bank details.

6.2.10. Information about the size and structure of wages.

6.2.11. Contact information, including mobile phone, office mail, identifier in the Telegram messenger.

6.2.12. Statistical information about the visited pages of the University's Internet resources (visited pages, time spent on the page, search depth, browser used, system time, unique user identifier, ip-address, provider, cookies, WebGL parameters, points of entry and exit from the site, browser fingerprint (canvas fingerprint), etc.).

6.2.13. For individuals who have not reached the age of majority - information about the persons representing their interests.

6.2.14. Other data that do not contradict the purposes of PD processing at the University.

7. The procedure and conditions for PD processing:

7.1. The operator, within the framework of his activities, commits with the personal data specified in clause 6.2. of this Policy, the following actions, both individually and in aggregate: collection, recording, systematization, accumulation, storage, clarification, extraction, use, transfer, depersonalization, deletion, blocking, destruction and other actions necessary to achieve the goals of PD processing and not violating the rights of the PD subject.

7.2. All actions specified in clause 7.1. of this Policy are made by the operator in the following ways:

7.2.1. Without the use of automation tools.

7.2.2. Using automation tools.

7.2.3. In a mixed way.

- 7.3. The University may transfer personal data of subjects to third parties if:
  - 7.3.1. The University delegated PD processing to a third party.
  - 7.3.2. The transfer of personal data is necessary to fulfill the contractual relationship.
  - 7.3.3. The transfer is necessary for the implementation of banking services, social, health and pension insurance services.
  - 7.3.4. The transfer of PD is necessary to the bodies of inquiry, other authorized bodies on the grounds provided for by the current legislation of the Russian Federation.
  - 7.3.5. In other legal cases that do not contradict the legislation of the Russian Federation and do not violate the rights of the PD subject.
- 7.4. PD processing is carried out in accordance with the requirements of the legislation of the Russian Federation to ensure PD confidentiality. The implementation of information protection measures and control over their observance is carried out by an employee responsible for ensuring the security of PD, appointed by order of the Director of the University.
- 7.5. The University may use third-party Internet services (third-party technologies) to organize the collection of statistical personal data, third-party Internet services that store the received data on its own servers. The operator is not responsible for the localization of the servers of third-party Internet services. At the same time, such third-party Internet services (technologies of third parties) installed on the site and used by the operator may install and read cookies from the browsers of the end users of the site or use web beacons to collect information in the course of advertising activities on the site. The procedure for the collection and use of data collected by such third-party Internet services (third-party technologies) is determined independently by these third-party Internet services, and they are directly responsible for compliance with this procedure and the use of the data they collect, including these third-party Internet services are responsible and ensure compliance with the requirements of applicable law, including the legislation on personal data of the Russian Federation.
8. Storage of PD and termination of PD processing.
  - 8.1. The storage of PD is carried out in a form that makes it possible to determine the PD subject for a period not longer than the purpose of PD processing requires, except for cases when the PD storage period is established by federal law, an agreement to which the PD subject is a party, beneficiary or guarantor.
  - 8.2. Personal data storage is carried out on paper, electronic media in databases and virtual machines. PD processed to achieve different goals are processed on different physical or virtual media.
  - 8.3. Termination of PD processing is made in the following cases:
    - 8.3.1. The goals of PD processing have been achieved and (or) the storage period for PD has expired.
    - 8.3.2. The purposes of PD processing have lost their relevance, there is no need to continue PD processing.
    - 8.3.3. A notification was received from the PD subject about the incorrectness of the processed PD.
    - 8.3.4. A notification was received from the PD subject about the revocation of consent to PD processing.
    - 8.3.5. The employees responsible for processing and ensuring the security of personal data revealed the fact of unlawful processing of personal data.
9. The rights of the PD subject.

9.1. The PD subject has the right to withdraw consent to the processing of PD by sending a corresponding request to the University by mail or by contacting in person.

9.2. The PD subject has the right to receive information regarding the processing of his PD, including containing: confirmation of the fact of PD processing by the University; legal grounds and purposes of PD processing; the purposes and methods of PD processing used by the University; the name and location of the University, information about persons (except for employees / employees of the University) who have access to PD or to whom PD can be disclosed on the basis of an agreement with the University or on the basis of federal law; processed PD related to the relevant PD subject, the source of their receipt, unless another procedure for submitting such data is provided for by federal law; terms of PD processing, including the terms of their storage; the procedure for the exercise by the subject of personal data of the rights provided for by the Law on Personal Data; information on the performed or expected cross-border data transfer; name or surname, first name, patronymic and address of the person who processes PD on behalf of the Operator, if the processing is entrusted or will be entrusted to such a person; other information provided for by the Law on Personal Data or other federal laws.

9.3. The PD subject has the right to demand that the University clarify his PD, block or destroy them if the PD is incomplete, outdated, inaccurate, illegally obtained or not necessary for the stated purpose of processing, as well as take measures provided by law to protect his rights.

9.4. If the PD subject believes that the University is processing his PD in violation of the requirements of the Law on Personal Data or otherwise violates his rights and freedoms, the PD subject has the right to appeal against the actions or inaction of the University to the authorized body for the protection of the rights of personal data subjects (Federal Service for Supervision of in the field of communications, information technology and mass communications (Roskomnadzor) or in court.