

Personal data processing policy

Approved by the General Director's
Order No. 2 dated 29.02.2024
and effective from 01.03.2024

1. General terms

- 1.1. The present policy of personal data processing is elaborated according to the requirements of the Federal Law of 27 July 2006 No. 152-FZ "On Personal Data" and determines the procedure for personal data processing and measures to ensure the security of personal data in the Autonomous Non-Commercial Organization "International and Comparative Law Research Center" ("**Operator**").
- 1.2. The Operator sets as its most important goal and condition for the performance of its activities the observance of human and citizens' rights and freedoms during the processing of personal data, including the protection of rights to privacy and personal and family life.
- 1.3. This Operator's policy regarding the processing of personal data (the "**Policy**") applies to all information that the Operator may receive about the visitors of the website with the domain name iclr.ru (and its third-level domains).
- 1.4. This Policy and amendments to it shall be approved by the General Director of the Operator.

2. The basic concepts in the Policy

- 2.1. Automated processing of personal data – the processing of personal data using computer technologies.
- 2.2. Blocking of personal data – temporary termination of processing of personal data (except for the cases when processing is necessary for the specification of personal data).
- 2.3. Website – a set of graphic and information materials, as well as computer programs and databases, providing their availability on the Internet at the network addresses <https://iclr.ru/>; <https://iclr.ru/en> (and their 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 – the actions as a result of which it is impossible to determine the belonging of personal data to a particular User or other subjects of personal data without the use of 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, a municipal body, a legal or physical person, independently or together with other persons organizing and (or) carrying out the processing of personal data,

and also defining the purposes of the processing of personal data, the structure of personal data which are subject to processing, the actions (operations) made with personal data.

- 2.8. Personal data – any information related directly or indirectly to the User of the website located at the network addresses <http://iclrc.ru>; <https://iclrc.ru/en> (and their third-level domains).
- 2.9. The User – any visitor of the website at the network addresses <http://iclrc.ru>; <https://iclrc.ru/en> (and their third-level domains).
- 2.10. Providing personal data – the actions aimed at disclosure of personal data to a certain person or a certain number of persons.
- 2.11. Dissemination of personal data – any actions directed at disclosing personal data to an uncertain number of persons (transfer of personal data) or at familiarization with personal data of an unlimited number of persons, including disclosing personal data in the mass media, placing in information-telecommunication networks, or granting access to personal data in any other way.
- 2.12. Personal Data Subject – a person, including a representative of a legal entity, individual entrepreneur, who provided personal data to the Operator, including those who sent their personal data to the Operator by filling out forms on the website with the domain name iclrc.ru (and its third-level domains).
- 2.13. Cross-border transfer of personal data – the transfer of personal data to the territory of a foreign state to the authority of a foreign state, to a foreign physical or foreign legal entity.
- 2.14. Destruction of personal data – any actions as a result of which personal data are irrevocably destroyed with the impossibility of further restoration and maintenance of personal data in the information system of 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; to 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.
- 4.3. Depersonalized personal data of the Users collected through 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 personal data processing

- 5.1. The Operator processes the personal data of the User only in case of filling in the special forms located on the website and/or sending the personal data by the User himself. 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 personal data processing

- 6.1. Security of personal data, which is processed by the Operator, is provided by the realization of the legal, organizational, and technical measures necessary for performance in full of the requirements of the current legislation in the field of the protection of the personal data.
- 6.2. The Operator ensures the security of personal data and takes all possible measures to exclude access to the 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 with the note "Personal Data Update".
- 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 with the note "Revocation of consent to the processing of personal data".

7. Measures taken by the Operator to ensure protection of personal data

- 7.1. 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, and also:
 - determines threats to the security of personal data during their processing;
 - adopts bylaws and other documents regulating relations in the field of personal data processing and protection;
 - appoints persons responsible for ensuring personal data security in the Operator's structural subdivisions and information systems;
 - creates necessary conditions for working with personal data;
 - organizes accounting of documents containing personal data;
 - organizes work with information systems in which personal data is processed;

- stores personal data in conditions that ensure their security and prevent unauthorized access to them;
 - organizes training of the Operator's employees processing personal data.
- 7.2. If there is a risk of violation of the rights of the Personal Data Subject, the Operator shall immediately inform about such violation of personal data as soon as possible under the circumstances.

8. Cross-border transfer of personal data

- 8.1. The Operator does not carry out cross-border transfer of personal data.

9. Final provisions

- 9.1. The User can receive any explanations on the questions concerning the processing of his personal data by contacting the Operator by e-mail at info@iclrc.ru.
- 9.2. In case of identification of inaccuracies in personal data, the Personal Data Subject may update them by sending a notice to the Operator on the e-mail address info@iclrc.ru with the note "Personal Data Update".
- 9.3. The Personal Data Subject may withdraw his/her consent to the processing of personal data at any time by sending a notice to the Operator by e-mail info@iclrc.ru with the note "Revocation of consent to the processing of personal data".
- 9.4. The Personal Data Subject may always opt out of receiving informational communications by sending a notice to the Operator by e-mail info@iclrc.ru marked "Opt-out of notifications".
- 9.5. 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 edition.
- 9.6. The current edition of the Policy is available on the Internet at https://iclrc.ru/policy_eng.pdf.