

Policies and "Sistrom" LLC in respect of personal data processing

The legal address of LLC Sistrom : 1 19331 Moscow, Vernadsky Avenue, 29

1. Purpose and scope of the document

1. "The policy of Sistrom LLC (hereinafter also referred to as the Company) in relation to the processing of personal data" (hereinafter referred to as the Policy) determines the position and intentions of the Company in the field of processing and protecting personal data in order to respect and protect the rights and freedoms of each person and, in particular, the rights to privacy, personal and family secrets, protection of honor and good name.
2. The policy is strictly enforced by the managers and employees of all structural divisions and branches of Sistrom LLC.
3. The Policy applies to all personal data of subjects processed in the Company with the use of automation tools and without the use of such means.
4. This Policy has access to any subject of personal data.

2. Definitions

1. Personal data - any information relating to a directly or indirectly determined or determined individual (citizen). Those. To such information, in particular, include: name, year, month, date and place of birth, address, information about family, social, property status, information about education, profession, income, information about health, as well as other information.
2. Personal data processing - any action (operation) or a set of actions (operations) with personal data, performed using automation means or without using such means. Such actions (operations) include: collection, receipt, recording, systematization, accumulation, storage, refinement (update, change), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data .

3. The personal data subjects of Sistrom LLC process the personal data of the following persons:

- employees LLC Sistrom ;
- subjects with whom contracts of civil character are concluded;
- Candidates for the vacancies of LLC Sistrom ;

- Sistrom LLC clients ;
- registered users and site of "Sistrom"
- representatives of legal entities;
- suppliers (individual entrepreneurs).

4. Principles and conditions for the processing of personal data

1. By the security of personal data, LLC Sistrom means the protection of personal data from unlawful or accidental access to them, destruction, alteration, blocking, copying, provision, dissemination of personal data, as well as from other illegal actions in relation to personal data and accepts the necessary legal, organizational and technical measures to protect personal data.
2. Processing and ensuring the security of personal data in LLC Sistrom is carried out in accordance with the requirements of the Constitution of the Russian Federation, Federal Law No. 152-Φ3 "On Personal Data", by-laws, other defining cases and peculiarities of personal data processing of federal laws of the Russian Federation, governing and methodical documents of the FSTEC of Russia and the FSB of Russia.
3. When processing personal data LLC Sistrom adheres to the following principles:
 - legality and fair foundations;
 - restrictions on the processing of personal data to the achievement of specific, predetermined and legitimate goals;
 - prevent processing of personal data that is incompatible with the purposes of collecting personal data;
 - prevent the merging of databases containing personal data that are processed for purposes that are incompatible with each other;
 - processing of personal data that meet the purposes of their processing;
 - content matching.
4. The Company processes personal data only if at least one of the following conditions is present:

- the processing of personal data is carried out with the consent of the subject of personal data to the processing of his personal data;
 - the processing of personal data is necessary to achieve the goals stipulated by law for the implementation and fulfillment of the functions, powers and duties assigned by the legislation of the Russian Federation to the operator;
 - personal data processing is necessary for the execution of the contract, the party to which either the beneficiary or the guarantor for which is the subject of personal data, as well as for the conclusion of the contract on the initiative of the subject of personal data or the contract for which the subject of personal data will be the beneficiary or surety;
 - the processing of personal data is necessary for the exercise of the rights and legitimate interests of the Company or third parties or to achieve socially significant goals, provided that this does not violate the rights and freedoms of the subject of personal data;
 - processing of personal data is carried out, access of an unlimited number of persons to which is provided by the subject of personal data or upon his request;
 - the processing of personal data to be published or mandatory disclosure in accordance with federal law.
5. LLC Sistrom has the right to entrust the processing of personal data of citizens to third parties, on the basis of an agreement concluded with these persons.
Persons engaged in the processing of personal data on behalf of LLC Sistrom undertake to comply with the principles and rules for the processing and protection of personal data provided for by Federal Law No. 152-Φ3 “On Personal Data”. For each person, a list of actions (operations) with personal data that will be performed by a legal entity that processes personal data is determined, the processing goals are set, the person’s obligation to maintain confidentiality and ensure personal data security during their processing is established, and protection requirements for personal data are specified. data.
6. In cases established by the legislation of the Russian Federation, LLC Sistrom has the right to transfer personal data of citizens.
7. In order to provide information to the Company, publicly accessible sources of personal data of employees, including

reference books and address books, can be created. Publicly available sources of personal data with the consent of the employee may include his last name, first name, middle name, date and place of birth, position, contact telephone numbers, e-mail address. Information about the employee must be at any time excluded from publicly available sources of personal data at the request of the employee or by a court or other authorized government bodies.

8. The Company destroys or depersonalizes personal data upon the achievement of processing objectives or in the event of the loss of the need to achieve the processing objective .

5. Rights of the subject of personal data

A citizen, whose personal data are processed by LLC Sistrom , has the right to:

- receive from LLC Sistrom :
- confirmation of the processing of personal data by Sistrom LLC;
- legal grounds and purposes for the processing of personal data;
- information about the methods of personal data processing used by Sistrom LLC ;
- the name and location of LLC Sistrom ;
- information about persons who have access to personal data or who may disclose personal data on the basis of an agreement with LLC Sistrom or on the basis of federal law;
- the list of processed personal data relating to the citizen from whom the request was received and the source of their receipt, unless another procedure for providing such data is provided for by federal law;
- information about the processing time of personal data, including the storage period;
- information on the procedure for the implementation by a citizen of the rights provided for by the Federal Law "On Personal Data" No. 152-FZ;
- information about ongoing or proposed transboundary transfer of personal data;

- the name and address of the person engaged in the processing of personal data on behalf of LLC Sistrom ;
- other information provided for by the Federal Law “On Personal Data” No. 152-Φ3 or other federal laws;
- Require clarification of their personal data, their blocking or destruction if personal data are incomplete, outdated, inaccurate, illegally obtained or not necessary for the stated purpose of processing;
- withdraw your consent to the processing of personal data;
- to demand elimination of unlawful actions of Sistrom LLC in relation to its personal data;
- appeal against the actions or omissions of LLC Sistrom to the Federal Service for Supervision in the Sphere of Communications, Information Technologies and Mass Communications (Roskomnadzor) or in court if a citizen believes that LLC Sistrom processes its personal data in violation of the requirements of the Federal Law No. 152-Φ3 “On Personal Data” or otherwise violates its rights and freedoms;
- to protect their rights and legitimate interests, including damages and / or moral damages in court.
- **A responsibility**

In case of default of the provisions of this policy and of "Sistrom" is liable under the Russian Federation legislation.

DRAW YOUR ATTENTION TO!

Get explanations on issues of processing your personal data that interest you by contacting Sistrom LLC personally or by sending an official request to the Post of Russia at 1 19331 Moscow, Vernadsky avenue , 29, PO Box 115.

In the case of an official request to Sistrom LLC, the following must be indicated in the request text:

- FULL NAME;
- the number of the main document certifying the identity of the subject of personal data or his representative, information about the date of issue of the said document and the issuing authority;
- information confirming your participation in relations with LLC Sistrom or information otherwise confirming the fact of the processing of personal data of LLC Sistrom ;

- signature of a citizen (or his legal representative). If the request is sent in electronic form, it must be executed in the form of an electronic document and signed with an electronic signature in accordance with the legislation of the Russian Federation.

The website www.sistrom.ru publishes an up-to-date version of the “Sistrom LLC Policy on Personal Data Processing”.

Information on the implemented requirements for the protection of personal data

When processing personal data, LLC Sistrom takes the necessary legal, organizational and technical measures to protect personal data from unauthorized or accidental access to them, destruction, modification, blocking, copying, provision, dissemination of personal data, as well as from other illegal actions in relation to personal data.

Such measures in accordance with Federal Law No. 152-ФЗ “On Personal Data” include:

- identification of threats to the security of personal data during their processing in personal data information systems;
- the use of organizational and technical measures to ensure the security of personal data during their processing in personal data information systems necessary to meet the requirements for the protection of personal data, the execution of which ensures the levels of personal data protection established by the Government of the Russian Federation;
- the use of the information security protection measures passed in the prescribed manner;
- assessment of the effectiveness of measures taken to ensure the security of personal data prior to the commissioning of the personal data information system;
- detection of unauthorized access to personal data and taking action;
- restoration of personal data modified or destroyed due to unauthorized access to them;
- the establishment of rules for access to personal data processed in the personal data information system, as well as ensuring the registration and accounting of all actions performed with personal data in the personal data information system;
- control over measures taken to ensure the security of personal data and the level of security of personal data information systems;

- registration of personal data carriers;
- organization of access control on the territory of the Company;
- placement of technical means for processing personal data within the protected area;
- maintenance of technical means of protection, alarms in constant readiness;
- monitoring user actions, conducting trials on violations of personal data security requirements

In order to coordinate actions to ensure the security of personal data, Sistrom LLC has appointed persons responsible for ensuring the security of personal data.