

POLICY ON PERSONAL DATA PROCESSING

1. General Provisions

1.1 This Policy on Personal Data Processing (hereinafter referred to as the Policy) is developed in accordance with Article 18.1 of the Federal Law No. 152-FZ dd. July 27, 2006 "On Personal Data" and is applicable to all personal data that The Federal Agency for the Commonwealth of Independent States, Compatriots Living Abroad and International Humanitarian Cooperation (Rossotrudnichestvo) (hereinafter referred to as the Operator) may receive from personal data subjects.

1.2 The Policy applies to personal data received both before and after the adoption of this Policy.

2. Purpose and Principles of Personal Data Processing

2.1 Personal data refers to any information directly or indirectly related to a certain or defined individual.

2.2 The purpose of collecting, processing, storing and other operations with personal data of employees, contractors, performers, customers or third parties (hereinafter referred to as personal data subjects) is the fulfillment of obligations of the Operator under a contract between them and the Operator.

2.3 The following principles shall apply when processing personal data of subjects:

- Collection, processing, storing, and other actions with personal data must be lawful;
- Only the minimum amount of personal data required to achieve the stated processing purposes shall be collected;
- Processing and storing personal data shall be secured by certain measures;
- Rights of a personal data subject regarding access to their personal data shall be observed.

3. Personal Data Processing

3.1 The list of personal data that will be processed:

- Full name;
- Passport details or other identity document;
- Date of birth, place of birth;
- Citizenship;
- Details of the document confirming the compatriot status;
- Photo;
- Details of the documents confirming vocational education, professional retraining, professional development, internship;
- Details of the documents confirming special knowledge;
- Details of the documents confirming academic degree, academic status, lists of scientific works and inventions;
- Foreign language skills;
- Residence address;
- Contact phone number;

- Sex;
- E-mail address;
- Health information (contained in the HIV certificate and other medical certificates);
- Medical insurance.

4. Purposes of Collection and Processing of Personal Data

4.1 The Operator processes personal data for the following purposes, including:

- provision of services to foreign citizens and stateless persons in enrolling at educational institutions of the Russian Federation;

4.2 With the personal data subject's consent, the Operator may use personal data of counterparties, foreign citizens and stateless persons for the following purposes:

- to exchange (receive, transfer, process) information when assisting foreign citizens and stateless persons in enrolling at educational institutions of the Russian Federation, including:
 - The Ministry of Science and Higher Education of the Russian Federation;
 - Federal State Budgetary Institution Center for Development of Education and International Activity (Interobrazovaniye) (in order to accomplish the state assignment by the Ministry of Science and Higher Education of the Russian Federation);
 - Educational organizations selected by the Candidate when applying for rendering services by the Operator;
 - The Department of Federal Migration Service of the Russian Federation (for issuance of visa invitations for the Candidate's receipt of educational visa).
- to conduct statistical and other studies based on anonymized personal data.

5. Personal Data Transfer

5.1 The Operator shall neither provide nor disclose information containing personal data of foreign citizens and stateless persons to third parties without the consent of a personal data subject, unless it is necessary for the purpose of preventing a threat to life and health, as well as when otherwise is prescribed by federal laws.

5.2 Upon a reasoned request, personal data of a personal data subject may be transferred without their consent solely for the purpose of fulfilling the lawful powers:

- to judicial authorities in relation to justice;
- to state security bodies;
- to prosecutors' office;
- to police authorities;
- to investigating authorities;
- to the Administration of the Federal Migration Service of the Russian Federation;
- to other bodies and institutions in cases stipulated by regulations binding upon the Operator.

5.3 The Operator's employees processing personal data shall not answer any questions related to the transfer of personal data by phone.

6. Rights and Obligations

6.1 Operator's rights and obligations:

6.1.1 The company, as a personal data operator, is entitled to the following:

- to defend its interests in court;
- to provide personal data of subjects to third parties, if required by the current legislation (tax, law enforcement agencies, etc.);
- to refuse to provide personal data as stipulated by the legislation of the Russian Federation;
- to use personal data of a subject without their consent, in cases provided by the current legislation of the Russian Federation.

6.1.2 Operator of personal data is obliged to the following:

take the measures necessary and sufficient to ensure the fulfillment of obligations provided for by the Federal Law dd. July 27, 2006 No. 152-FZ "On Personal Data" and regulations adopted in accordance therewith.

6.2 Personal Data Subject's rights:

- to request the clarification of their personal data, its blocking or destruction in the event that the personal data is incomplete, outdated, unreliable, illegally obtained or not required for the stated purpose of processing, as well as to take measures provided by law to protect their rights;
- to request the list of personal data processed by the Operator and its source;
- to obtain information concerning the terms of processing of their personal data, including the terms of its storage;
- to request that all persons who have previously been provided with inaccurate or incomplete personal data be informed of any exceptions, amendments or additions made to it;
- to appeal in an authority empowered to protect the rights of personal data subjects or in court against illegal actions or omissions in the processing of their personal data;
- to protect their rights and lawful interests, including compensation for losses and (or) compensation for emotional harm in court.

7. Measures to Ensure the Protection of Personal Data

7.1 Operator may not process personal data of personal data subjects without their written consent, excluding cases listed in clause 2 of Art. 6 of the Federal Law No. 152-FZ "On Personal Data". The written consent can be drawn as a separate document or be included in any other document signed by the personal data subject.

7.2 The Operator shall take necessary administrative and technical measures to protect personal data. The measures taken are based on the requirements of Art. 18.1, Art. 19 of the Federal Law dd. July 27, 2006 No. 152-FZ "On Personal Data" and other regulations concerning personal data, including:

- 1) persons to process and ensure security of personal data were appointed;
- 2) fulfillment of the provisions of this Policy shall be supervised by person(s) responsible for processing of personal data of the Operator;
- 3) liability of the Operator's officials that have access to personal data in case the regulations governing processing and protection of personal data are not observed is specified in accordance with the laws of the Russian Federation and the Operator's in-house documents;
- 4) persons processing personal data are instructed and familiarized with regulations governing the handling and protection of personal data;
- 5) rights of access to processed personal data are delineated;
- 6) separate storing of personal data (on physical media), which are processed for different purposes, is ensured;
- 7) regular inspections of personal data processing conditions shall be conducted in order to maintain internal supervision over compliance of personal data processing with the established requirements;
- 8) in addition to the measures mentioned above, technical measures are being taken to:
 - prevent unauthorized access to systems storing personal data;
 - backup and restore personal data, as well as maintain the hardware, software, information protection means in the information personal data systems altered or destroyed as a result of unauthorized access;
 - ensure protection of personal data in other ways.

8. Revision of the provisions of the Policy

8.1 This Policy is an in-house document of the Operator, which shall be made public via the Operator's official website.

8.2 This Policy is subject to amendment and updating should new legislative acts and special regulations on personal data processing and protection arise.

8.3 Fulfillment of the provisions of this Policy shall be supervised by person(s) responsible for processing of personal data of the Operator.