**POLICY**

**of personal data processing «ARTeex» Ltd**

**1. General points**

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* 1. The current policy of personal data processing «ARTeex» Ltd (further —Policy of PD processing) is worked out according to requirements of the law of the Russian Federation about personal data.
	2. The policy of PD processing is worked out in order to provide protection of rights and freedoms of a personal data subject while his PD are being processed (further –PD)
	3. The points of the Policy of PD processing are used as a basis for internal documents to be worked out, regulating issues of PD processing of the Operator‘s employees and of other subjects of PD (local acts) in «ARTeex» Ltd.

**2. The purposes of PD processing**

The Operator processes personal data for the following purposes:

1) Realization and carrying out of functions, authorities and obligations, assigned by the legislation, by the Operator, such as:

* Meeting requirements of the law in taxation and labour ;
* Conduct of current and tax accounting , forming , making and providing of accounting, tax and statistic reports on time;
* Meeting requirements of law in determination of order of PD processing and protection of citizens who are clients or counterparts of the Operator ;

2) Following rights and legal interests of the Operator within activities specified by the Charter or other documents, or achieving public significant purposes;

3) For other legal purposes.

**3. The Legal base for personal data processing**

PD processing is fulfilled according to the following federal laws and regulatory legal acts:

Constitution of the Russian Federation;

Labor law of the Russian Federation;

Federal law of 27 July 2006 № 152-FL «About personal data »;

Federal law of 27 July 2006 № 149-FL «About information, informational technologies and information protection ».

Resolutions of the Russian Federation Government of 15 September 2008№ 687 «About peculiarities of personal data processing, fulfilled without using means of automation »;

Resolutions of the Russian Federation of 1November 2012. № 1119 «About approval of requirements to personal data protection while processing them in information systems of personal data. »;

The order of FSTEC of Russia of 18 February 2013. № 21 «About approval of content of organizational and technical measures to provide safety of personal data while they are processed in informational systems of personal data »;

The order of Federal Service for Supervision of Communications, Information Technology and Mass Media of 05 September 2013. № 996 « About approval of requirements and methods for depersonalization of personal data »;

Other regulatory legal acts of the Russian Federation and regulatory documents of authorized bodies of the State power.

**4. The list of actions with personal data**

While processing the PD the Operator can perform the following actions with PD : collection , recording ,systematization , accumulation, storage , verification (updating ,editing ), extraction , usage , passing (spreading , providing , access), depersonalization, blocking, deleting , destruction of personal data , other actions , specified by the law.

**5. The content of the personal data being processed**

5.1. The following objects of PD whose PD are to be processed:

* Employees of the Operator ;
* Clients of the Operator ;
* Counterparts of the Operator ;
* Individuals who appealed to the Operator according to the Federal Law « About considering appeals of the Russian Federation citizens».

5.2. The content of PD of every categories of subjects, mentioned in point 5.1 of the current Policy of PD processing, are defined according to regulatory documents , listed in point 3 of the current Policy of PD processing , and also according to internal documents of the Operator , published to assure their fulfillment.

5.3. In cases envisaged by The Russian Federation Law, the subject of PD makes decision to provide his PD to the Operator and gives his permission to have them processed freely, according to his will and in his interest.

5.4. The Operator ensures compliance of the content and volume of the processed data to the stated purposes of processing and, if it is necessary, takes measures to delete their surplus compared to the stated purposes of processing.

5.5. Processing of special categories of PD , regarding race , nationality , political views , religious or philosophical believes , personal life are not done by the Operator.

 **6.Personal data processing**

The Operator does the PD processing in the following ways:

non-automated PD processing;

automated PD processing with sending of the received information by informational-tele communicational networks or without them.

**7. Information about the requirements realized by the Operator regarding PD protection.**

The Operator takes measures, necessary and sufficient to ensure obligations fulfilment, according to the Federal Law of 27July 2006 № 152-FL «About Personal data » (further – Federal Law «About personal data ») and corresponding regulatory legal acts. The Operator defines content and the list of measures necessary and sufficient to ensure fulfilment of obligations, according to the Federal Law «About personal data », by other regulatory legal acts. These measures are:

appointment of a man responsible for organization of personal data processing by the Operator;

publishing of inner documents by the Operator, which define his policy regarding personal data processing, inner documents about issues of personal data processing, as well as inner documents defining procedures to prevent and reveal violations of the Russian Federation Law regarding personal data, to eliminate consequences of such violations.

taking of legal, organizational and technical measures to provide PD safety ;

realization of inner control and (or) audit of compliance of personal data processing to the Federal Law «About personal data» and regulatory legal acts regarding them, requirements to personal data protection, the Operator’s policy regarding personal data processing and inner documents of the Operator;

evaluation of damage which could be caused by the Federal Law «About personal data » violations , balance between the stated damage and measures taken by the Operator , to ensure obligations fulfilment according to the Federal Law «About personal data »;

introduction of the Operator’s employees , who are processing personal data , with articles of the Russian Federation Law about personal data, including requirements to personal data protection , and documents defining the Operator’s policy to personal data processing , local acts about issues of personal data processing and (or) teaching the listed employees.

7.2. While processing the personal data the Operator takes necessary legal, organizational and technical measures or ensures their taking in order to protect personal data from illegal or accidental access to them, from deleting, editing, blocking, copying, providing and spreading of personal data, as well as from other illegal actions regarding personal data.

**8. The right of the person to have access to his personal data**

8.1. A person who provides his personal data can demand from the Operator to precise his personal data, to block or delete them in case the personal data are incomplete, outdated, incorrect, obtained illegally or are not necessary for the stated purpose of processing, as well as to take legal measures to protect his rights.

8.2. Information is provided to the person or to his representative by the Operator after the request of the person or his representative. The request should contain the number of the main document, which certifies personality, the subject of personal data or his representative, information when the document was given and the name of the organization. There should be information confirming relationship of the person with the Operator (the number of agreement, the date of the agreement, conditional word identification and /or other information ), or information confirming personal data processing by the Operator in a different way , the signature of the subject of PD or his representative. The request can be sent as an electronic document and signed by electronic signature (the analogue of a personal signature) according to the Law of the Russian Federation, if this way of exchanging of electronic documents is specified by the Agreement between the Operator and the subject of personal data or according to the Law of the Russian Federation. .

8.3. The Operator has the right to refuse the subject of personal data to have the second request performed. But such refusal must be motivated. The Operator must provide evidence to explain the refusal to satisfy the second request.

8.4. The subject of the personal data has the right to obtain information regarding his personal data processing including:

Confirmation of the fact that the personal data have been processed by the Operator;

Legal base and purposes of personal data processing;

Purposes and ways the Operator uses in personal data processing;

The name and the location of the Operator, information about people (apart from the Operator’s employees) who have access to personal data or who could have access to them according to the agreement with the Operator;

Personal data being processed , related to the subject of the personal data , the source of their obtaining , if another order of getting the data is not defined by the Law ;

The period of personal data processing and the period of their storage;

The order of implementation of rights the subject of personal data has according to the Federal Law «About personal data »;

Information of fulfilled or intended trans-boundary transfer of personal data;

Other information defined by the Law.

8.5. If the subject of personal data believes that the Operator processes his personal data breaking requirements of the Federal Law «About personal data » or violates his rights and freedoms in any ways, the subject of personal data has the right to complain about actions or inactions of the Operator to the body responsible for personal data protection or in court.

8.6. The Subject of personal data has the right for his rights and legal interests protection, including payment of damages and (or) compensation of moral harm in court.

**9. The final points**

The Operator provides unlimited access to the Policy of PD processing – the document regulating his policy regarding personal data processing and containing information about realized requirements to personal data protection, by publishing it in open access on the informational –tele communicational network Internet on the site of the Operator. The address of the Operator Site on the informational –tele communicational network Internet is: arteex.ru.