



## Personal data processing policy

### 1. General terms

1.1. The present policy of personal data processing is made 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 safety of personal data in the Autonomous Non-Commercial Organization "International and Comparative Law Research Center" (hereinafter, "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 secrets.

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 located in the domain name iclrc.ru (and its third-level domains).

### 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 address <https://iclrc.ru/> (and its 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 on the domain name iclrc.ru (and its third-level domains);

2.9. The User – any visitor of the website located on the domain name iclrc.ru (and its third-level domains);

2.10. Providing personal data – the actions aimed at disclosure of personal data to a certain person or a certain circle of persons;

2.11. Dissemination of personal data – any actions directed at disclosing personal data to an uncertain circle of persons (transfer of personal data) or at familiarization with personal data of an unlimited circle 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. 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;

2.13. 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. The User can always refuse to receive information messages by sending a letter to the Operator at [info@iclrc.ru](mailto:info@iclrc.ru) with the note "Refusal of notifications".

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. Safety 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 safety 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](mailto:info@iclr.ru) with the note "Updating of personal data".

6.5. Consent to processing of personal data permitted by the personal data subject for dissemination shall be executed separately from other consents of the personal data subject to processing of his/her personal data. The operator shall provide the personal data subject with the opportunity to determine the list of personal data for each category of personal data specified in the consent for processing of personal data permitted by the personal data subject for dissemination.

6.6. In the consent to the processing of personal data permitted by the personal data subject for dissemination, the personal data subject shall be entitled to establish prohibitions on the transfer (other than granting access) of this personal data by the operator to an unlimited number of persons, and prohibitions on the processing or conditions of processing (other than granting access) of this personal data by an unlimited number of persons. The operator's refusal to subject personal data to the prohibitions and conditions set forth by this Article shall not be permitted. The prohibitions established by the personal data subject on the transfer (other than granting access), as well as on the processing or conditions of processing (other than obtaining access) of personal data permitted by the personal data subject for distribution shall not apply to cases of personal data processing in state, public and other public interests, defined by Russian law.

6.7. 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](mailto:info@iclr.ru) with the note "Revocation of consent to the processing of personal data".

## **7. Cross-border transfer of personal data**

7.1. The operator before the beginning of realization of personal data transboundary transfer is obliged to be convinced that the foreign state in which territory it is supposed



to carry out a transfer of the personal data, provides the reliable protection of the rights of subjects of the personal data.

7.2. Cross-border transfer of the personal data in the territory of the foreign states, which do not meet the above-stated requirements, can be carried out only in case of the consent in writing of the subject of the personal data on cross-border personal data transfer and (or) the execution of the contract, the party of which is the subject of the personal data.

## 8. Final provisions

8.1. The User can get any explanations on the questions concerning the processing of his personal data by contacting the Operator by e-mail at [info@iclrc.ru](mailto:info@iclrc.ru).

8.2. This document will reflect any changes in the policy of personal data processing by the Operator. The policy is indefinitely valid until it is replaced by a new version.

8.3. The current version of the Policy is freely available on the Internet at <https://iclrc.ru/en/policy.pdf>.