

Approved by
CEO LLC "Fine Street Publishing House"



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REGULATION ON PROCESSING AND PROTECTION OF PERSONAL DATA

1. General Regulations

1.1. This Regulation is governed by the Constitution of the Russian Federation, the Federal Law "On Information, Information Technologies and the Protection of Information" No. 149 dated July 27, 2006, the Federal Law "On Personal Data" No. 152 dated July 27, 2006 and other regulatory legal acts.

1.2. The main concepts used in the Regulation:

Organizer - FineStreet Publishing House Limited Liability Company 197101, St. Petersburg, 26-28 Kamennostrovsky Ave., letter A, room 72n, room. 1-7, 9-16, TIN 7826056049 / KPP 781301001 (hereinafter the Organizer).

Website is an Internet resource representing a set of information and intellectual property contained in an information system (including a computer program, a database, graphic design of an interface (design), etc.), access to which is provided from various user devices connected to the Internet, through special software for viewing web pages (browser) at <http://www.addwards.ru> (including domains of the following levels related to these addresses) or mobile apps.

Site visitor is an individual who visited the site and is not registered on the site;

User is a registered visitor of the Internet resource <http://www.addwards.ru>, whose status is divided into three categories: "Participant of the Competition", "Member of the Jury", "Registered User";

Participant of the Competition is a specialist registered on the site (architect, designer, decorator) with access to the Personal Account, the ability to edit personal data and create a portfolio;

Jury member is a professional, business or media expert registered on the site with access to the Personal Account, the ability to edit personal data and take part in the voting of the professional jury;

Registered user is an individual authorized by the site administrator and able to participate in open public voting;

Site administration is a circle of persons registered on the site with the maximum level of access to the site management, including authorization of all categories of users, creation and editing of content;

Processing of personal data means actions (operations) with personal data, including collection, systematization, accumulation, storage, clarification (updating, changing), use, disclosure (including transfer), depersonalization, blocking, destruction of personal data;

Disclosure of personal data means actions aimed at transferring personal data to a certain circle of persons (transfer of personal data) or familiarizing oneself with personal data of an unlimited circle of persons, including disclosing personal data in the media, posting on information and telecommunication networks or providing access to personal data in any other way;

Use of personal data means actions (operations) with personal data performed by the operator in order to make decisions or take other actions that give rise to legal consequences in relation to the subject of personal data or other persons or otherwise affect the rights and freedoms of the subject of personal data or other persons;

Confidentiality of personal data is a requirement for the operator or other person who has gained access to personal data to comply with the requirement not to allow their disclosure without the consent of the subject of personal data or the presence of any other legal basis.

1.3. These Regulations establish the procedure for the processing of the competition participants personal data.

1.4. The purpose of the Regulation is to ensure the protection of the rights and freedoms of man and citizen in the processing of his personal data.

1.5. Personal data is processed in order to fulfill the Organizer's Public Offer posted on the Site; one of the parties to the Public Offer is a participant in the competition. The organizer collects data only to the extent necessary to achieve the named goal.

1.6. Personal data cannot be used to cause property and moral harm to citizens, or to hinder the realization of the rights and freedoms of citizens of the Russian Federation.

1.7. These Regulations are approved by the General Director and are obligatory for all employees who have access to the personal data of the competition participants.

2. Composition and acquisition of personal data

2.1. Personal data collected and processed by the Organizer includes: personal data (last name, first name); address of residence; E-mail; telephone number;

2.2. Organizer employees receive all personal data directly from the subject of personal data - participants of the competition.

3. Processing and storage of personal data

3.1. The processing of personal data by the Organizer in the interests of the competition participants is to obtain, systematize, accumulate, store, clarify (update, change), use,

disseminate, depersonalize, block, destroy and protect against unauthorized access to personal data of the competition participants.

3.2. The consent of the competition participant to the processing of personal data is not required, since the processing of personal data is carried out in order to fulfill the Public Offer, one of the parties of which is the subject of personal data - the competition participant.

3.3. Processing of the participant's personal data is carried out using the mixed processing method.

3.4. Only the organizer's employees who are allowed to work with the personal data of the competition participants and have signed the Agreement on non-disclosure of personal data of the competition participants can access to the processing of the competition participants personal data.

3.5. The list of employees with access to personal data of the competition participants is determined by order of the Organizer head.

3.6. The personal data of the competition participants on paper are stored by the Organizer in a safe, access to materials is available only to employees who have signed the non-disclosure statement.

3.7. The personal data of the competition participants are electronically stored in the local computer network of the Internet store, in electronic folders and files in the personal computers of the Organizer, the Organizer's employees, who are allowed to process the personal data of the competition participants.

4. Use and transfer of personal data

4.1. The use of personal data is carried out exclusively to achieve the goals defined by the Public Offer.

4.2. When transferring personal data, the Organizer should comply with the following requirements:

4.2.1. To warn persons receiving personal data that these data can only be used for the purposes for which they are communicated, and to require confirmation from these persons that this rule has been observed. Persons receiving the personal data of the competition participants are required to comply with confidentiality. This regulation does not apply in case of depersonalization of personal data and in relation to publicly available data.

4.2.2. To allow access to personal data only to specially authorized persons, while these persons should be entitled to receive only those personal data that are necessary to perform specific functions.

4.2.3. When cross-border transfer of personal data it is obliged to make sure that the foreign state in whose territory the transfer of personal data is carried out provides adequate protection of the rights of personal data subjects.

4.2.4. Cross-border transfer of personal data on the territory of foreign states that do not provide adequate protection of the rights of subjects of personal data may be carried out in the following cases:

- the availability of written consent;
- provided by international treaties of the Russian Federation on the issue of visas, international treaties of the Russian Federation on the provision of legal assistance in civil, family and criminal matters, as well as international treaties of the Russian Federation on readmission;
- provided by federal laws, if it is necessary in order to protect the foundations of the Russian Federation constitutional system, ensure the country's defense and state security;
- execution of an agreement to which the subject of personal data is a party;
- protection of life, health, other vital interests of the subject of personal data or other persons if it is impossible to obtain written consent of the subject of personal data.

4.3. It is not allowed to answer questions related to the transfer of information containing personal data by phone or fax.

4.4. The organizer has the right to provide or transfer personal data to third parties in the following cases:

- if the disclosure of this information is required to comply with the law, the execution of a judicial act;
- to assist in investigations carried out by law enforcement or other government agencies;
- to protect the rights and legitimate interests of bidders and the Organizer.

5. Protection of personal data from unauthorized access

5.1. When processing personal data, the organizer is obliged to take the necessary organizational and technical measures to protect personal data from unauthorized or accidental access to them, destruction, modification, blocking, copying, distribution of personal data, as well as from other illegal actions.

5.2. For the effective protection of personal data, it is necessary:

5.2.1. to comply with the procedure for obtaining, recording and storing personal data;

5.2.2. to apply technical means of protection, signaling;

5.2.3. to conclude with all employees associated with the receipt, processing and protection of personal data, the Non-disclosure Agreement for the personal data of the competition participants;

5.2.4. to bring to disciplinary action employees guilty of violating the rules governing the receipt, processing and protection of personal data of the competition participants.

5.3. Access to the personal data of the contest participants of the Organizer's employees who do not have properly designed access is prohibited.

5.4. Documents containing the personal data of the competition participants are stored in the premises of the Organizer, providing protection against unauthorized access.

5.5. Access to electronic databases containing personal data is protected by:

- the use of licensed software products that prevent unauthorized third parties from accessing personal data;
- password system. Passwords are set by the system administrator and communicated individually to employees who have access to personal data.

5.6. Copying and extracting personal data is allowed solely for official purposes with the written permission of the Organizer's management.

6. Responsibilities of the Organizer

6.1. The organizer must:

6.1.1. To process personal data solely for the purpose of fulfilling the Public Offer.

6.1.2. To receive personal data of the participant directly from him. If personal data can only be obtained from a third party, then the competition participant must be notified in advance and written consent must be obtained from him. The Organizer's employees must inform the contestants about the goals, the alleged sources and methods of obtaining personal data, as well as the nature of the personal data to be received and the consequences of the participant's refusal to give written consent to receive it.

6.1.3. Not to receive or process the personal data of the contestant about his race, nationality, political views, religious or philosophical convictions, state of health, intimate life, except as otherwise provided by law.

6.1.4. To provide access to your personal data or its legal representative upon request or upon receipt of a request containing the number of the main document proving the identity of the competition participant or his legal representative, information on the date of issue of the specified document and the authority that issued it and the handwritten signature of the competition participant or his legal representative. The request may be sent in electronic form and signed by an electronic digital signature in accordance with the legislation of the Russian Federation. Information on the availability of personal data should be provided to the competition participant in an accessible form and they should not contain personal data related to other personal data subjects.

6.1.5. To restrict the right of the competition participants to access their personal data if:

1) the processing of personal data, including personal data obtained as a result of operational search, counterintelligence and intelligence activities, is carried out for the purpose of defending the country, state security and law enforcement;

2) the processing of personal data is carried out by the authorities that detained the subject of personal data on suspicion of committing a crime or charged the subject of personal data with a criminal case, or applied a measure of restraint to the subject of personal data before bringing charges, with the exception of cases provided for by the criminal procedure legislation of the Russian Federation if it is allowed to familiarize the suspect or accused with such personal data;

3) the provision of personal data violates the constitutional rights and freedoms of others.

6.1.6. Ensure storage and protection of personal data from unlawful use or loss.

6.1.7. In the event that the operator reveals inaccurate personal data or unlawful actions with them when contacting or at the request of the personal data subject or his legal representative or the authorized body for the protection of the rights of personal data subjects, the operator is obliged to block personal data related to the relevant personal data subject from the moment of such contacting or receiving such a request for the verification period.

6.1.8. In case of confirmation of the fact of unreliability of personal data, the operator is obliged to clarify personal data and remove their blocking on the basis of documents submitted by the personal data subject or his legal representative or the authorized body for the protection of the rights of personal data subjects, or other necessary documents.

6.1.9. In the event that unlawful actions with personal data are detected, the operator, within a period not exceeding three business days from the date of such identification, is obliged to eliminate the violations. If it is impossible to eliminate the committed violations, the operator must destroy the personal data within a period not exceeding three business days from the date of the discovery of the illegality of actions with personal data. The operator is obliged to notify the subject of personal data or his legal representative about the elimination of the violations committed or about the destruction of personal data, and if the appeal or request was sent by the authorized body for the protection of the rights of subjects of personal data, also the specified body.

7. Rights of the competition participant

7.1. The competition participant has the right to:

- access to information about yourself, including information containing confirmation of the fact of processing personal data, as well as the purpose of such processing; personal data processing methods used by the online store; information about persons who have access to personal data or who may be granted such access; a list of processed personal data and the source of their receipt, the processing time for personal data, including the storage period; information on what legal consequences for a participant in the tender may entail the processing of his personal data;

- determination of the forms and methods of processing his personal data; restriction of methods and forms of processing personal data; a ban on the distribution of personal data without his consent; change, refinement, destruction of information about oneself.

8. Confidentiality of personal data

8.1. Information about the personal data of the competition participants is confidential.

8.2. The organizer ensures the confidentiality of personal data and is obliged to prevent their distribution to third parties without the consent of the competition participants or the presence of any other legal basis.

8.3. Persons with access to the personal data of the competition participants are required to comply with the confidentiality regime; they must be warned about the need to observe the secrecy regime. In connection with the confidentiality regime of personal information, appropriate security measures should be provided to protect data from accidental or unauthorized destruction, from accidental loss, from unauthorized access to them, alteration or distribution.

8.4. All measures of confidentiality during the collection, processing and storage of personal data of bidders apply to all storage media, both paper and automated.

8.5. The confidentiality mode of personal data is removed in cases of depersonalization or inclusion in public sources of personal data, unless otherwise specified by law.

9. Responsibility for violation of the rules governing the processing of personal data

9.1. The organizer is responsible for the personal information that is at his disposal and secures the personal responsibility of employees for compliance with the established confidentiality regime.

9.2. Each employee of the Organizer receiving a document for work containing the personal data of the competition participants is solely responsible for the safety of the medium and the confidentiality of information.

9.3. Any person may contact the Organizer's employee with a complaint about a violation of this Regulation. Complaints and applications regarding compliance with data processing requirements are considered within three days from the date of receipt.

9.4. The Organizer's employees are obliged to provide due consideration of requests, applications and complaints of the competition participants, as well as to facilitate the implementation of the requirements of the competent authorities.

9.5. Persons guilty of violating the rules governing the receipt, processing and protection of personal data of the competition participants are subject to disciplinary, administrative, civil or criminal liability in accordance with the laws of the Russian Federation.