

Ministry of Education and Science of the Russian Federation

Approved

FSAEI HE "Kazan (Volga Region) Federal University"

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Kazan

POLICY

**of personal data processing at the federal state
autonomous educational institution of higher education
"Kazan (Volga Region) Federal University"**

1. General Terms

1.1. The policy of personal data processing at the federal state autonomous educational institution of higher education "Kazan (Volga region) Federal University" (hereinafter referred to as the Policy and KFU, respectively) defines the basic principles, purposes, conditions and methods of personal data processing, lists of subjects and personal data processed at KFU, the functions of KFU in the processing of personal data, the rights of subjects of personal data, as well as the requirements for the protection of personal data implemented at KFU.

1.2. The Policy is developed with respect to the requirements of the Constitution of the Russian Federation, legislative and other regulatory legal acts of the Russian Federation regarding personal data.

1.3. The terms of the Policy serve as the basis for the development of local KFU regulations on processing personal data of employees and students of KFU, patients of the KFU Medical and Sanitary Unit, and other subjects' personal data.

2. Legislative and other regulatory legal acts of the Russian Federation, under which the Policy of personal data processing in KFU is determined

2.1 Personal data processing at KFU is determined in accordance with the following regulatory legal acts:

Labour Code of the Russian Federation;

Federal Law No. 152-ФЗ of July 27, 2006 "On Personal Data";

Decree of the President of the Russian Federation No. 188 of March 6, 1997 "On approval of the List of confidential information";

resolution of the Government of the Russian Federation No. 687 of September 15, 2008 "On approval of the Terms on the specifics of personal data processing carried out without using automation devices";

resolution of the Government of the Russian Federation No. 512 of July 6, 2008 "On approval of requirements for physical media of biometric personal data and technologies of storing such data outside personal data information systems";

resolution of the Government of the Russian Federation No. 1119 of November 01, 2012 "On approval of requirements for the protection of personal data when processing it in personal data information systems";

order of the FSTEC of Russia No. 55, of Russia's Federal Security Service No. 86, of the Ministry of Information Technologies and Communications of Russia No. 20 of February 13, 2008 "On approval of the Procedure for the classification of personal data information systems";

order of the FSTEC of Russia No. 21 of February 18, 2013 "On approval of the composition and content of organizational and technical measures to ensure the security of personal data during its processing in personal data information systems";

other regulatory legal acts of the Russian Federation and regulatory documents of authorized government bodies.

2.2. In order to implement the terms of the Policy, KFU develops the respective local regulatory legal acts and other documents, including:

- concept of information security in automated systems of information and communication at KFU;
- regulation on processing and protection of personal data at KFU;
- policy of information security of personal data information systems at KFU;
- order on the appointment of individuals responsible for the personal data processing at KFU;
- order on conducting an internal check of information systems of personal data at KFU;
- report on the result of an internal check to ensure the protection of personal data in the information systems of personal data at KFU;
- list of personal data information systems of KFU subject to protection;
- list of access groups and permitted actions assigned to KFU employees who work in personal data information systems;
- user's instructions for personal data information system of KFU;
- technical passports of personal data information systems of KFU;
- models of security threats of information systems of personal data of KFU;
- assessment of threats and particular models of security threats of personal data during their processing in personal data information systems of KFU;
- list of structural units of KFU conducting the processing of personal data on paper;
- list of structural units that process personal data in information systems of personal data of KFU;
- journal for recording measures taken to monitor compliance with the personal data protection regime;
- other local regulatory legal acts and documents regulating the personal data processing at KFU.

3. Basic terms and definitions used in the local regulatory legal acts of KFU, managing personal data processing

Personal data is any information relating directly or indirectly to a particular or identifiable individual (subject of personal data).

Information is knowledge (messages, data) regardless of the form of its presentation.

Operator is a state body, a municipal body, a legal entity or an individual, which independently or together with other people organizes and (or) processes personal data, as well as determines the purposes of processing personal data, its composition, and actions (operations) carried out with personal data.

Personal data processing is any action (operation) or a set of actions (operations) carried out with personal data, using automation devices or without using them, including collection, recording, systematization, accumulation, storage, adjustment (updating, changing), retrieval, use, transfer (dissemination, provision, access), depersonalization, blocking, deletion, destruction of personal data.

Automated personal data processing is processing of personal data using computer technology.

Provision of personal data is actions aimed at disclosing personal data to a certain person or a certain circle of persons.

Dissemination of personal data is actions aimed at disclosing personal data to an indefinite circle of persons.

Cross-border transfer of personal data is the transfer of personal data to the territory of a foreign state to a foreign state authority, a foreign individual or a foreign legal entity.

Blocking of personal data is a temporary suspension of the processing of personal data (except for the cases when processing is necessary for adjustment of personal data).

Destruction of personal data is actions, as a result of which it becomes impossible to restore the content of personal data in the information system of personal data, and (or) as a result of which physical media of personal data is destroyed.

Depersonalization of personal data is actions, as a result of which it becomes impossible to determine the belonging of personal data to a particular subject without using additional information.

Personal data information system is a set of personal data contained in databases and information technologies and equipment, which provide its processing.

4. Principles and purposes of personal data processing

4.1. KFU, being the operator of personal data, processes personal data of employees, students, patients of the KFU Medical and Sanitary Unit, and of other subjects of personal data that are not in employment and other relations with KFU.

4.2. The processing of personal data at KFU is carried out taking into account the need to ensure the protection of the rights and freedoms of employees, students of KFU and of other subjects of personal data, including the protection of the right to privacy, personal and family secrets, based on the following principles:

- personal data processing is carried out at KFU on a legal and fair basis;
- personal data processing is limited to the achievement of specific, predetermined and legal purposes;
- processing of personal data, which does not correspond to the purposes of collecting personal data is not allowed;
- integration of the databases containing personal data, the processing of which is carried out for distinct purposes is not allowed;
- only personal data which corresponds to the purposes of its processing is subject to processing;
- content and scope of processed personal data corresponds to the stated purposes of processing. The excess of the processed personal data in relation to the stated purposes of their processing is not allowed;
- when processing personal data, its accuracy sufficiency, and, if necessary, relevance in relation to the purposes of processing personal data are ensured. KFU takes the necessary measures or ensures their application to delete or adjust incomplete or inaccurate personal data;
- storage of personal data is carried out in a form that makes it possible to determine the subject of personal data, for no longer than the purpose of personal data processing requires it, in case if the storage period of personal data is not established by federal law, an agreement to which the subject of personal data is a party, beneficiary or guarantor;
- the processed personal data is destroyed or depersonalized upon achievement of the processing purposes or when there is no longer the need to achieve these purposes, unless otherwise provided by federal law.

4.3. Personal data is processed at KFU in order to:

- ensure compliance with the Constitution of the Russian Federation, legislative and other regulatory legal acts of the Russian Federation, local regulatory acts of KFU;
- carry out functions, powers and duties imposed by the legislation of the Russian Federation at KFU, including provision of personal data to government bodies, to the Pension Fund of the Russian Federation, to the Social Insurance Fund of the Russian Federation, to the Federal Fund of Compulsory Medical Insurance, as well as to other state bodies;
- regulate employment relations with the employees of KFU (assistance in employment, training and promotion, ensuring personal safety, monitoring the quantity and quality of work performed, ensuring the safety of property);
- ensure the educational process for students of KFU;
- provide medical care to the population;
- protect life, health or other vital interests of subjects of personal data;
- prepare, conclude, execute and terminate contracts with counterparties;
- provide access control procedure and internal security policy at KFU facilities;
- enforce judicial acts, acts of other bodies or officials subject to execution in accordance with the legislation of the Russian Federation on enforcement proceedings;
- exercise the rights and legal interests of KFU in the implementation of the types of activities provided by the Organization Charter and other local regulations of KFU,
- achieve other legal purposes.

5. List of subjects whose personal data are processed at KFU

5.1. KFU processes personal data of the following categories of subjects:

- employees and students of KFU;
- patients;
- other subjects of personal data (to ensure the implementation of the purposes of processing specified in section 4 of the Policy).

6. List of personal data processed at KFU

6.1. The list of personal data processed at KFU is determined in accordance with the legislation of the Russian Federation and local regulations of KFU, taking into account the purposes of processing personal data specified in Section 4 of the Policy.

6.2. The processing of special categories of personal data related to race, nationality, political views, religious or philosophical beliefs, intimate life is not carried out at KFU.

7. Functions of KFU in personal data processing

7.1. KFU when processing personal data:

- takes necessary measures that are sufficient for ensuring compliance with the requirements of the legislation of the Russian Federation and local regulations of KFU in the field of personal data;

- takes legal, organisational and technical measures to protect personal data from unauthorized or casual access, destruction, alteration, blocking, copying, provision, dissemination of personal data, as well as from other illegal actions in relation to personal data;
- designates persons responsible for organizing the processing of personal data at KFU;
- publishes local regulations that determine the policy and issues of processing and protecting personal data at KFU;
- familiarises the employees of KFU, its branches that directly process personal data, with the terms of the legislation of the Russian Federation and local regulations of KFU in the field of personal data, and with the requirements for the protection of personal data, and provides training for these employees;
- publishes or otherwise provides unrestricted access to this Policy;
- informs in the prescribed manner the subjects of personal data or their representatives on the availability of personal data relating to the relevant subjects, provides an opportunity to familiarise with these personal data when contacting and (or) receiving requests from these subjects of personal data or their representatives, unless otherwise provided by law of the Russian Federation;
- stops processing and destroys personal data in the cases provided by the legislation of the Russian Federation in the field of personal data;
- performs other actions stipulated by the legislation of the Russian Federation in the field of personal data.

8. Conditions for personal data processing at KFU

8.1. The processing of personal data at KFU is carried out with the consent of the subject of personal data, unless otherwise provided by the legislation of the Russian Federation in the field of personal data.

8.2. KFU does not disclose or disseminate personal data to third parties without the consent of the subject of personal data, unless otherwise provided by federal law.

8.3. KFU has the right to put another person in charge of the processing of personal data with the consent of the subject of personal data on the basis of an agreement concluded with this person. The contract must contain a list of actions (operations) with personal data that will be performed by the person processing personal data, the purposes of processing, the obligation of that person to keep the personal data secret and ensure the security of personal data during their processing, as well as requirements for the protection of processed personal data in accordance with Article 19 of the Federal Law "On Personal Data".

8.4. In order to secure internal information management, KFU may create internal reference materials, which, with the written consent of the subject of personal data, may include his last name, first name, patronymic, place of work, position, year and place of birth, address, subscriber number, e-mail address, other personal data provided by the subject of personal data, unless otherwise provided by the legislation of the Russian Federation.

8.5. Access to personal data processed at KFU is allowed only to KFU employees holding positions included in the list of positions, upon replacement of which the processing of personal data is carried out.

9. List of actions with personal data and methods of its processing

9.1. KFU collects, records, systematizes, accumulates, stores, adjusts (updates, changes), retrieves, uses, transfers (dissemination, provision, access), undertakes depersonalization, blocking, deletion and destruction of personal data.

9.2. The processing of personal data at KFU is carried out in the following ways:

- non-automated processing of personal data;
- automated processing of personal data with or without the transfer of the information received via information and telecommunication networks;
- mixed processing of personal data.

10. Rights of subjects of personal data

10.1. Personal data subjects have the right to:

- access complete information about their personal data processed at KFU;
- access their personal data, including receiving a copy of any record containing their personal data, with the exception of cases provided for by federal law, as well as access to medical data related to them with the help of a medical specialist of their choice;
- adjustment of personal data, their blocking or destruction if the personal data is incomplete, outdated, inaccurate, illegally obtained or not necessary for the stated purpose of processing;
- withdrawal of consent to the personal data processing; taking measures provided by law to protect their rights; appeal against the actions or omissions of KFU, which led to violation of the requirements of the legislation of the Russian Federation in the field of personal data in the authorized body of the protection of the rights of subjects of personal data or in the court;
- exercise of other rights provided by the legislation of the Russian Federation;

11. Measures taken by KFU to ensure the fulfillment of the operator's obligations when processing personal data

11.1. The measures necessary and sufficient to ensure that KFU fulfills the operator's obligations provided by the legislation of the Russian Federation in the field of personal data include:

- appointment of a person responsible for organizing the personal data processing in KFU;
- adoption of local regulations and other documents in the field of processing and protection of personal data;
- obtaining the consent of the subjects of personal data to the processing of their personal data, with the exception of cases provided for by the legislation of the Russian Federation;
- ensuring separate storage of personal data and their physical media, the processing of which is carried out for different purposes and which contain different categories of personal data;
- storage of physical media of personal data in compliance with the conditions ensuring their safety and excluding unauthorized access to them;
- identifying security threats of personal data during their processing, creating threat models on their basis;

- implementation of anti-virus control, prevention of the implementation of malicious programs (virus programs) and implant tools into the corporate network;
- organization of access control to the territory of KFU;
- implementation of internal control over the compliance of personal data processing with the Federal Law "On Personal Data" and the regulatory legal acts adopted in accordance with it, the requirements for the protection of personal data, this Policy, local regulatory acts of KFU;
- other measures provided for by the legislation of the Russian Federation in the field of personal data.

12. Monitoring compliance with the legislation of the Russian Federation and local regulations of KFU in the field of personal data, including requirements for the protection of personal data

12.1. Monitoring compliance with the legislation of the Russian Federation and local regulations of KFU in the field of personal data, including the requirements for the protection of personal data is carried out in order to verify the compliance of the processing of personal data with the legislation of the Russian Federation and local regulations of KFU in the field of personal data, including the requirements for the protection of personal data, as well as measures taken to prevent and identify violations of the legislation of the Russian Federation in the field of personal data, identify possible channels of leakage and unauthorized access to personal data, eliminate the consequences of such violations.

12.2. Internal control over compliance with the legislation of the Russian Federation and local regulations of KFU in the field of personal data, including the requirements for the protection of personal data, is carried out by the person responsible for organizing the processing of personal data in KFU on the basis of the order of the rector of KFU.

13. Changes and additions to the Policy

13.1. Changes and additions to this Policy are made by preparing a draft Policy in a new edition by the Human Resources Department in accordance with the procedure established by KFU.

14. Newsletter

14.1. This Policy is subject to mandatory distribution, which is carried out by the Office of Document Management and Control (hereinafter - UDC) in accordance with the procedure established by the KFU Records Management Instruction.

14.2. This Policy is posted on the website of the KFU Human Resources Department on the KFU web portal.

15. Registration and storage

15.1. This Policy is registered in the UDC. The original copy of this Policy is kept in the UDC until it is replaced with a new version. A copy of this Policy is kept as part of organizational documents of the KFU Human Resources Department.

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"Kazan (Volga Region) Federal University"

APPROVED

Head of Legal Department

Signature G.M. Sibgatullina

APPROVED

Vice rector for administrative work – chief of staff

Signature A.N. Khashov