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|  | **Approved by MITU-MASI rector****No.\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ dated October 13, 2016** |

**Personal data processing policy**

**in the Autonomous Non-Profit Organization of Higher Education Moscow Information Technology University – Moscow Institute of Architecture and Civil Engineering**

**1. INTRODUCTION**

1.1. This document shall define the policy (hereinafter referred to as the “Policy”) of the Autonomous Non – Profit Organization of Higher Education Moscow Information Technology University-Moscow Institute of Architecture and Civil Engineering (hereinafter referred to as “MITU–MASI”) regarding the processing of personal data.

1.2. This Policy has been drawn up and approved in accordance with the requirements of Article 18.1 of Federal Law No. 152-FZ dated 27.07.2006 "On Personal Data" and applies to all personal data processed by MITU-MASI.

1.3. The purpose of this Policy is to ensure the protection of human and civil rights and freedoms when processing personal data, as well as the interests of MITU-MASI.

1.4. This Policy shall define the purposes, principles, procedure and conditions for the processing of personal data of employees, students and other persons whose personal data is handled by MITU-MASI, and also includes a list of measures aimed at ensuring the security of personal data during the processing thereof.

1.5. This Policy shall apply to all personal data subjects specified in clause 5.1 hereof. This Policy shall regulate any information that is directly or indirectly related to a particular or identifiable individual (personal data subject) and that MITU-MASI may obtain regarding its personal data subject.

**2. LEGAL GROUNDS FOR PERSONAL DATA PROCESSING**

2.1. This Policy shall be governed by Russian Labor Code, Federal Law No.152-FZ dated July 27, 2006 “On Personal Data”, Federal Law No. 273-FZ dated December 29, 2012 “On Education in the Russian Federation”, and other legal rules, statutes and regulations.

2.2. In accordance with this Policy, MITU-MASI shall develop and approve local regulations regulating the procedure for organizing the processing and ensuring the security of personal data.

**3. PERSONAL DATA PROCESSING PURPOSES AND PRINCIPLES**

3.1. MITU-MASI shall process personal data for the following purposes:

3.1.1. compliance with Russian law requirements when carrying out the activities provided for by the Bylaws (Charter), licenses and local regulations of MITU-MASI;

3.1.2. collection and storage of personal data needed by MITU-MASI for the purposes and in connection with the execution of agreements and contracts signed with the personal data subject;

3.1.3. provision of customized services to the personal data subject;

3.1.4. communication with the personal data subject, if necessary, including sending notifications, requests and information, including those related to the use of services and the provision thereof, as well as processing requests and applications from the personal data subject;

3.1.5. improving the quality of services, the convenience of their use, the development of new services and solutions;

3.1.6. conducting statistical and other research based on depersonalized data.

3.2. When carrying out its operations, MITU-MASI shall ensure compliance with the personal data processing principles and provisions specified in Articles 5 and 6 of Federal Law 152-FZ “On Personal Data”.

MITU-MASI shall process personal data based on the following principles:

- the legality and fairness of personal data processing purposes and methods;

- the correspondence of personal data processing purposes to those pre-defined and declared during personal data collection, as well as to the powers and authorities of MITU-MASI;

- the correspondence of processed personal data volume, nature and methods to personal data processing purposes;

- the reliability of personal data, their sufficiency for the purposes of processing, the inadmissibility of processing personal data in excess of and other than for the purposes declared when collecting personal data;

- the inadmissibility of combining personal data containing databases created for incompatible purposes;

- personal data shall be stored in a form allowing to identify the subject thereof and no longer than required for the processing purposes;

- once the processing purposes are achieved or if same are no longer needed to be achieved, the personal data shall be deleted and destroyed.

**4. PROCESSING PROCEDURES AND CONDITIONS**

4.1. MITU-MASI shall process the personal data of its employees, students, as well as other persons who have given consent to the processing thereof, in compliance with concluded contracts or for the purpose of concluding same, in compliance with the obligations provided for by federal legislation and other regulatory legal acts, as well as for other purposes in accordance with the requirements of Federal Law No. 152-FZ dated July 27, 2006 "On Personal Data".

4.2. The processing of personal data shall be terminated upon the expiration of the period provided for by the law, other regulatory legal act of the Russian Federation, the contract, or the consent of the personal data subject to the processing of his or her personal data. When the subject of personal data withdraws consent to the processing of his or her personal data, such processing shall be carried out only to the extent necessary for the performance of contracts concluded with him or her and for the purposes provided for by the legislation of the Russian Federation.

4.3. MITU-MASI shall ensure the protection of personal data within the framework of a single set of organizational, technical and legal measures aimed at ensuring the protection of information constituting personal data. When ensuring the protection of personal data, MITU-MASI shall take into account and consideration the requirements of Federal Law No. 152-FZ dated July 27, 2006 "On Personal Data", regulatory legal acts adopted in accordance and in connection therewith, as well as the Labor Code of the Russian Federation.

4.4. Personal data shall be processed and stored for the period determined in accordance with the requirements set forth in Russian law (the Civil Code of the Russian Federation, the Labor Code of the Russian Federation, the Tax Code of the Russian Federation, the Federal Law No. 152-FZ dated 27.07.2006 "On Personal Data", as well as other legal requirements applicable in Russia), as well as the regulations and bylaws of MITU-MASI.

4.5. MITU-MASI shall terminate the processing of personal data in the following cases:

- when the purpose of personal data processing is achieved;

- when the regulations and statutes constituting the legal basis for the processing of personal data are amended or declared null and void;

- if MITU-MASI happens to be processing personal data illegally;

- when the subject of personal data withdraws his or her consent to the processing of his or her personal data, provided that the Federal law requires that personal data be processed with such consent only.

4.6. MITU-MASI shall delete and destroy personal data in accordance with the procedure and terms stipulated by the legislation of the Russian Federation.

**5. PERSONAL DATA SUBJECT CATEGORIES**

5.1. MITU-MASI shall processes the personal data of the following categories of personal data subjects:

- employees who have a labor relationship with MITU-MASI;

- MITU-MASI students and their legal representatives;

- individuals who have a contractual relationship with MITU-MASI.

5.2. The rights of personal data subjects shall be defined by Federal Law No. 152-FZ "On Personal Data".

**6. PERSONAL DATA DISCLOSURE**

6.1. MITU-MASI shall not provide or disclose information containing personal data of personal data subjects to a third party without his or her consent, except in cases and to the extent necessary for preventing threats to life and health, as well as in cases established by federal laws.

6.2. MITU-MASI shall disclose the processed personal data to authorized organizations, competent authorities, state bodies, and social security funds only on the grounds and in the cases provided for by the legislation of the Russian Federation.

6.3. The personal data of a personal data subject may be disclosed without his or her consent to judicial authorities, state security bodies, prosecutor's offices, police, investigative bodies upon their reasonable request and solely for the performance of their respective functions and powers designated by law. Such disclosure shall be required in the instances provided for by binding legislative and regulatory documents and other statutes.

**7. PERSONAL DATA PROTECTION**

7.1. When processing personal data, MITU-MASI shall take all necessary legal, organizational and technical measures aimed at protecting personal data from unauthorized or accidental access, destruction, modification, blocking, copying, provision and dissemination thereof, as well as from other illegal actions that may be committed in relation to and in connection therewith.

7.2. The Operator shall take the following organizational and technical measures:

- appointing officials responsible for organizing personal data processing and protection;

- restricting and regulating the number and title of those employees who have access to personal data;

- familiarizing employees with the requirements of federal legislation and local regulatory documents governing personal data processing and protection;

- ensuring the accounting and storing of physical storage media and the handing thereof, in order to prevent theft, substitution, unauthorized copying and destruction thereof;

- identifying threats to the security of personal data when being processed in personal data information systems;

- developing a personal data protection system based on the threat model for a particular class of information systems;

- checking the availability and effectiveness of the use of information security tools;

- implementing a control system for user access to information resources, software and hardware for the purposes of processing and protecting information;

- password based protection of users ' access to the personal data information system;

- implementing anti-virus control, malware and software bug prevention (virus programs);

- accounting machine-based personal data media;

- backup of information;

- training employees who use information security tools in personal data information systems;

- accounting the means used for data protection, as well as the operational and technical documentation drawn up for them;

- monitoring user actions, conducting investigations into violations of personal data security requirements;

- organizing access control.

**8. CONFIDENTIALITY UNDERTAKINGS Х**

8.1. MITU-MASI or somebody else (if the processing of personal data is done by another person) shall ensure confidentiality, blocking, validation, processing termination and destruction of personal data in accordance with the requirements of Article 21 of the Federal law No. 152-FZ "On personal data".

8.2. Personal data processed to MITU-MASI shall be classified as confidential information.

8.3. MITU-MASI employees, whose access to personal data processed in the information system is necessary for the discharge of their official (professional) duties and responsibilities, shall respect the confidentiality of the processed personal data and shall be informed that, in accordance with Article 24 of the Federal Law 152 "On Personal Data", those found guilty of violating the requirements of the law shall be subject to civil, criminal, administrative, disciplinary and other liability provided for by the legislation of the Russian Federation.

8.4. MITU-MASI shall sign a confidentiality undertaking and a non-disclosure agreement in respect of personal data.

**9. MISCELLANEOUS**

9.1. This Policy shall constitute a publicly available document and shall be published on the official website of MITU-MASI.

9.2. This Policy may be amended if necessary.

9.3. Control over the implementation of the requirements hereof shall be exercised by the responsible person of MITU-MASI, who shall be appointed as per executive order issued in accordance with the applicable procedure.

9.4. For failing to comply with the personal data processing and protection requirements, those MITU-MASI officials who have access to personal data shall be held accountable in accordance with the Russian law governing personal data, as well as the local regulations of MITU-MASI.