

Leader-ID personal data processing policy

Moscow 2021

1. Terms, definitions and acronyms

The following terms and definitions are used herein:

Biometric personal data means personal data received as a result of special technical processing, concerning physical, physiological or behavioural characteristics of a natural person, which may be used for unique identification of such natural person, such as facial image or dactyloscopic data.

Health data means personal data related to the physical or mental health of a natural person (including information about provision of medical services to such person), which include disclosure of information about such person's health condition.

Personal data processing means an operation or set of operations performed with or without the use of automation equipment with respect to personal data, including collection, recording, organization, structuring, systematization, accumulation, storage, adaptation, clarification, updating, modification, restoration, consultation, use, disclosure through transfer (distribution, provision, access), depersonalization, blocking, grouping, combining, deletion, destruction.

Processor means a natural person or legal entity, state authority, agency or other body processing personal data on behalf of the operator and in accordance with the instructions given by the operator.

Operator means a natural person or legal entity, state authority, agency or other body determining the objectives and means for personal data processing independently or in cooperation with other operators.

Personal data means any information related to an identified or identifiable natural person (personal data subject); identifiable person — a person which may be identified directly or indirectly, e.g. by name, passport number, phone number, online identifier or one or more factors, specific to the physical, physiological, genetic, mental, economic, cultural or social identity of the person.

Consent means a freely given, specific, conscious and definitely identifiable will of the personal data subject, through which the subject (by declaration or any other explicit action) gives a permission for processing of the personal data related to such subject.

Special categories of personal data means personal data related to racial and ethnic origin, political views, religious or philosophical beliefs, as well as data about trade union membership, genetic data, biometric data, health data, intimacy data of the personal data subject.

2. General provisions

2.1 Purpose of the Policy

We, the Autonomous Non-commercial Organization “National Technological Initiative Platform” (hereinafter referred to as the Organization or We) are the Administration of Leader-ID and a personal data operator and think that protection of rights and freedoms of personal data subjects during processing of their personal data is an important condition for achievement of the objectives of our activities.

Personal data processing policy (hereinafter referred to as the Policy) determines our basic principles and conditions for personal data protection, as well as measures implemented by us in order to ensure personal data safety within provision of Leader-ID service. The Policy is an integral part of the User Agreement.

This Policy has been developed in accordance with the requirements established by the Federal Law No. 152-FZ of July 27, 2006 “On personal data”.

The Policy applies to processing and ensuring safety of the personal data processed by us, which may be received from natural persons or legal entities (counterparties) having a contractual relationship with us, as well as from personal data subjects.

2.2 Scope of the Policy

This Policy applies to any action (operation) or set of actions (operations), with or without the use of automation equipment with respect to personal data, collection, recording, organization, structuring, systematization, accumulation, storage, clarification, updating, modification, extraction, restoration, consultation, use, transfer (distribution, provision, access), blocking, deletion, destruction of personal data.

This Policy applies to the personal data received both prior and after the approval hereof.

This Policy determines the principles for personal data processing, categories of the personal data processed, categories of the personal data subjects, objectives and legal basis for personal data processing.

This Policy is to be updated in case of any amendments to the applicable legislation on personal data.

3. Personal data processing principles

We perform personal data processing in accordance with the following principles:

- Personal data processing is performed in a lawful, equitable and understandable manner. We perform personal data processing exclusively in case of existence of the necessary legal basis (see section 4.4 “Legal basis for personal data processing”), as well as inform the personal data subjects about the processing of their personal data in a timely, clear and understandable manner.

- Personal data processing is limited to the achievement of particular, pre-determined and lawful objectives. We do not allow personal data processing which is incompatible with the collection objectives (see section 4.2 “Personal data processing objectives”).
- The content and amount of the personal data processed is consistent with the processing objectives declared by us. We have determined the minimum amount of the personal data necessary for achievement of the personal data processing objectives (see section 4.3 “Categories of the personal data processed”).
- Accuracy, sufficiency and relevance of the personal data is ensured during personal data processing. We assess the reliability of the personal data source, as well as respond to requests by personal data subjects concerning clarification of their personal data.
- Personal data is stored in a form which allows to identify personal data subjects, no longer than required by the personal data processing objectives, if the term for personal data storage is not established by the applicable law or contract to which the personal data subject is a party, beneficiary or guarantor. After the achievement of the personal data processing objectives we delete the relevant personal data.
- Integration of databases containing personal data processed for the purposes which are incompatible is not allowed.
- During personal data processing, we ensure integrity and confidentiality of the personal data and implement the necessary organizational and technical protection measures (see section 8 “Personal data security measures during processing”).

4. Information about personal data processing

4.1 Categories of personal data subjects.

Within these activities, we can process the personal data related to the following categories of personal data subjects:

- users registered at Leader-ID;
- visitors of ours websites.

4.2 Personal data processing objectives

We process the personal data of the said categories of personal data subjects for pre-defined purposes.

Objectives for processing of personal data of users registered at Leader-ID:

- provision of the Leader-ID service, which may include:
 - creation of events;
 - registration of events in the calendar;
 - participation in projects, contests, completion of testing;
 - submissions of application for opening of the collective work site “Boiling Point”;
 - publication of materials;
 - watching event broadcasts;
 - using online resume repositories;

- user identification under the User Agreement and performance of contractual obligations;
- sending notices, information and requests in connection with the provision of services, as well as processing of applications and requests filed by the users;
- informing potential event participants through direct contacts with the personal data subjects.

Objectives for processing of personal data of website visitors:

- ensuring and improvement of operation of services available at the websites;
- collection of website visiting statistics for availability tracking and analysis of the use of Leader-ID service.

4.3 Categories of the personal data processed

We process personal data not falling under special categories of personal data.

Personal data of users of our websites:

- contact information (name, surname, patronymic, E-mail address, phone number, city of residence);
- general information (photo, date of birth, sex);
- education information (educational institution, courses taken, language skills);
- work information (company name, position, previous jobs);
- interests and other spheres of activity;
- passport data (identity document series and number, date and place of issuance of such document, name of the issuing authority);
- birth certificate data for minor users;
- additional information (information about the projects, programs or events within which the users registered, the projects which the users participated in, rating and feedback from experts and other system participants, diagrams reflecting the users' professional activities and development of their competencies);
- device technical information (HTTP headers, IP addresses, cookie files, browser identifier data, hardware and software information).

Personal data of visitors of our websites:

- device technical information (HTTP headers, IP addresses, cookie files, browser identifier data, hardware and software information).

We do not process personal data falling under the following categories:

- biometric personal data;
- personal data related to offences and convictions.

The operator is not responsible for processing of personal data placed by the users independently, without being requested to do so by the Organizer.

4.4 Legal basis for personal data processing

We process personal data on the following legal basis:

- compliance with the User Agreement between us and natural persons registered at Leader-ID;
- personal data subject's consent for processing of such subject's personal data;
- consent for processing of personal data approved for distribution by the personal data subject;
- compliance with the requirements of the applicable law;

In case of lack of other legal basis for personal data processing we receive explicit consent of subjects for processing of their personal data at the moment of personal data collection. In case if we are planning to process personal data for a purpose incompatible with the initial purpose of personal data processing, we receive a separate consent of personal data subjects for the planned purpose. In case if any personal data is received by us from any source other than the personal data subject, we inform the subject about such processing prior to its commencement.

In case of lack of the necessary written consent of the subject for personal data processing, such consent may be given by such personal data subject or such subject's lawful representative in any form which allows to determine the fact of its receipt.

4.5 Processing of minors' personal data

We do not process personal data of minors (persons under 18 in the Russian Federation or persons of other age in other jurisdictions) without the consent of their parents or lawful representatives.

4.6 Automated personal data processing

We do not take any decisions causing legal consequences with respect to personal data subjects or otherwise affecting their rights and lawful interests exclusively on the basis of automated personal data processing.

5. Receipt of personal data and their transfer to third parties

5.1 Who we can receive personal data from

we receive the personal data of the users and visitors of our websites and process them through Leader-ID service <https://leader-id.ru>. We can receive information about personal data subjects:

- from personal data subjects;
- from our official partners which are parties to agreements concluded with us (e.g. the results of our Users' participation in certain events).

Leader-ID Administration may receive personal data from ANO "National Technological Initiative University 2035" located at: 121205, Moscow, territory of the Skolkovo Innovation Centre, 1 Nobel' str., building 3, office 4. Personal data processing is performed with the purpose of monitoring of the dynamics of the digital footprint left by the users of the University 2035 Platform and provision of opportunity to use the results of analytical tools of the National Technological Initiative ecosystem.

Such processing of personal data is performed after acceptance of terms and conditions of the User Agreement and with the purpose of performance thereof (para. 5 of part 1 of Article 6 of the Federal Law No. 152-FZ "On personal data").

The digital footprint personal data are used by the Administrator of Leader-ID represented by the employees of the Administrator of Leader-ID, authorized to process personal data.

The source of personal data is the University 2035 Platform operated by ANO "National Technological Initiative University 2035".

The rights of personal data subjects are consistent with the rights of personal data subjects indicated in para. 6 hereof.

5.2 Who we can transfer data to

Personal data received from personal data subjects may be transferred to the following categories of recipients exclusively in case of existence of lawful grounds for such transfer:

- legal entities and natural persons with which we have contractual relations on the bases of the agreements concluded;
- third parties, provided that the personal data subject is requesting us to transfer its personal data to such parties (or the personal data subject has been otherwise informed about such third parties and has given its consent during registration at our website for participation in events, programs, projects and other activities, as well as during authentication in social media through our website);
- state authorities or third parties in response to requests for information submitted within investigations concerning illegal activities;
- state authorities for compliance with the requirements of the applicable law.

We may transfer technical information from the devices of the users and visitors of our websites to our partners (Yandex LLC and Google Inc.).

We may distribute personal data by publishing it at the Operator's information resources in accordance with the procedure established by the Federal Law No. 152-FZ of July 27, 2006 "On personal data". Such resources must be indicated in the consent for processing of personal data approved for distribution by the personal data subject.

Personal data subject may impose conditions and prohibitions with respect to processing performed on the basis of the consent for processing of personal data approved for distribution by the personal data subject. In case if such conditions and prohibitions are imposed, the Operator shall publish the information about such conditions and prohibitions for third parties.

We are entitled to entrust personal data processing to a third party (personal data processor) on the basis of a contract concluded with such processor (instruction for personal data processing). In such a case we require that the processor comply with the principles and rules for personal data processing.

In case if we entrust personal data processing to a personal data processor, we remain responsible to the personal data subject for the processor's actions.

The personal data processor is accountable to us.

5.3 Cross-border transfer of personal data.

Personal data of personal data subjects is stored in a centralized manner, in information systems and databases, on servers located at the territory of the Russian Federation.

6. Rights of personal data subjects

We guarantee respect for the following rights of personal data subjects (free of charge) within 152-FZ “On personal data”:

- revocation of the consent for personal data processing with further personal data destruction (Article 9 152-FZ “On personal data”);
- receipt of information related to personal data processing (Articles 14, 16 of 152-FZ “On personal data”);
- correction of the provided personal data, if they are incomplete or incorrect (Article 14 of 152-FZ “On personal data”);
- deletion of personal data (Article 14 152-FZ “On personal data”);
- restriction of personal data processing (Article 15 of 152-FZ “On personal data”);
- sending an application to us (Article 17 of 152-FZ “On personal data”);
- sending an application to the relevant supervisory authority (Article 17 of 152-FZ “On personal data”).

For exercise of the said rights you need to apply to: 121205, Moscow, territory of the Skolkovo Innovation Centre, 1 Nobel'ia str., floor 3, office IV. We process and respond to requests by personal data subjects within 30 days.

The consent revocation procedure is indicated separately for each consent.

Considering the complexity and number of such requests, the request performance term may be extended. In such a case we will inform the personal data subjects about the reasons for the delay within 30 days.

7. Personal data storage

Personal data is deleted:

- after the achievement of objectives of their processing, indicated in the Policy;
- in case if the achievement of such objectives is no longer necessary;
- in case if the consent for personal data processing is revoked;
- upon request by the personal data subject;

In certain cases we must store personal data as long as required by the applicable law.

We also implement measures for organization of storage of personal data processed without automation equipment, including:

- for each category of personal data, places for personal data storage (physical media) are determined and the list of persons performing personal data processing and having access to such data is established;
- separate storage of personal data (physical media) processed for different purposes is ensured;
- conditions ensuring preservation of personal data and excluding unauthorized access thereto during physical media storage are complied with.

8. Personal data security measures during processing

During personal data processing, we implement the necessary legal, organizational and technical measures for protection of personal data from illegal or random access, destruction, modification, blocking, copying, provision, distribution of personal data, as well as from other illegal actions with respect to personal data.

Personal data safety is ensured, in particular, by the following measures:

- appointment of a person responsible for organization of personal data processing;
- maintaining a registry of processes related to personal data processing;
- performance of analysis of risks for personal data subjects during processing of their personal data and implementation of the necessary personal data protection measures;
- implementation of organizational and technical measures for protection of personal data both during determination of means for personal data processing and during the processing itself;
- involving counterparties providing proper guarantees with respect to implementation of the necessary organizational and technical data protection measures;
- development, approval and performance of internal documents governing processes related to personal data processing;
- exercising internal control over consistency of personal data processing with the requirements of applicable law and regulations adopted in accordance therewith, as well as this Policy and internal documents;
- documenting personal data leaks and consequences thereof, investigation of incidents, notification of the relevant parties about incidents within 72 hours, as well as implementation of measures for eliminations of consequences of leaks and incidents;

- raising the employees' awareness with respect to personal data processing and protection, conducting training events;
- performance of scheduled and unscheduled audits of processes for personal data processing.

9. Policy violation and responsibility

We are responsible for the consistency of personal data processing and protection with the applicable law. All of our employees involved in personal data processing are responsible for compliance with this Policy and other local regulations governing processing and protection of personal data.

Each newly hired employee directly involved in personal data processing receives this Policy for review against signature and is required to comply with it.

10. Modification and entry into force of the Policy

This Policy is approved and enacted by the order of the General Director and remains effective until a decision is taken on its cancellation or approval of the new version of the Policy.

In case if any amendments are made, the date of the last update is indicated in the heading of the Policy. The new version of the Policy shall enter into force after its approval within the term indicated, unless otherwise indicated in the new version of the Policy.

11. Contact information

Autonomous Non-commercial Organization “National Technological Initiative Platform”

Address: 121205, Moscow, territory of the Skolkovo Innovation Centre, 1 Nobelia str., floor 3, office IV

E-mail address: users@leader-id.ru

Phone: 8 800 550 49 54