PERSONAL DATA PROTECTION POLICY

Document number	DOC148070
Document revision	1.0
Document status	Approved
Issue date	2018-05-01
Security status	Public
Master document location	http://docs.mera.ru/cgi-bin/download.cgi?doc=DOC148070

CONTENTS

1. GENERAL

1.1. PURPOSE

The present Personal Data Protection Policy is focused on the compliance with REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) – hereinafter referred to as GDPR.

GDPR requirements are applicable to the Company, as the Company might process personal data of EU citizens in the course of its activities.

1.2. SCOPE

The present Policy is applicable to MERA (hereinafter referred to as the Company).

The present Policy is applicable to processes and activities related to the processing of personal data belonging to EU data subjects, which might be performed by the Company in the course of its working activities.

2. ABBREVIATIONS AND DEFINITIONS

"Controller'"means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law;

"Data Subject" shall mean an identified or identifiable natural person as defined in the GDPR;

"GDPR" shall mean Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the Processing of Personal Data and on the free movement of such Personal Data;

"Personal Data" shall mean any information provided by Controller to Processor and relating to an identified or identifiable natural person as defined by the GDPR (hereinafter referred to as "Data Subject"). Personal Data includes the types of data listed in Annex 1 together with any additional Personal Data to which Processor has access from time to time in performing the Services;

"Processing" means any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;

"Processor" means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;

"Personal data breach" means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed;

"Supervisory authority" means an independent public authority which is established by a Member State;

3. POLICY STATEMENT

3.1. GENERAL STATEMENTS

The Company fully complies with GDPR requirements and is able to demonstrate the proof.

The Company shall take all possible measures to protect personal data belonging to EU data subjects that the Company might process in the course of its activities.

The Company claims that personal data belonging to EU data subjects that the Company might process in the course of its activities:

1. shall be processed lawfully, and the lawfulness of processing shall be verified;
2. shall be processed fairly and in a transparent manner in relation to the data subject;
3. shall be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
4. shall be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
5. shall be accurate and, where necessary, kept up to date;
6. shall be kept no longer than is necessary for the purposes for which the personal data are processed or no longer than the applicable legislation requires;
7. shall be protected from unauthorized or unlawful use or processing, disclosure, loss, destruction or damage by means of technical and organizational measures selected in accordance with the risk-based approach.

The Company claims to ensure that the basic rights of a data subject shall be preserved: right of access, right to rectification and erasure, right of restriction of processing, right to data portability, right to object, right not to be subject to a decision based solely on automated processing.

3.2. CONFIDENTIALITY

The Company ensures that its employees and any persons under its authority who access the personal data have committed themselves to confidentiality or are under an appropriate statutory obligation of confidentiality.

3.3. DATA PROCESSING AGREEMENTS

Where it is required to transfer personal data belonging to EU data subjects to a third country, Data Processing Agreement (hereinafter referred to as DPA) shall be signed between the parties involved.

The Company shall process the personal data following the requirements stipulated in DPA signed.

3.4. TECHNICAL AND ORGANIZATIONAL MEASURES

The Company claims to ensure the ongoing confidentiality, integrity, availability and resilience of processing systems and services.

The Company claims to ensure the ability to restore the availability and access to personal data in a timely manner in the event of a physical or technical incident.

The Company claims to ensure that personal data is protected from unauthorized or unlawful use or processing, disclosure, loss, destruction or damage and processing is performed in accordance with this Regulation.

For the following purposes, the Company has implemented appropriate technical and organizational measures (hereinafter referred to as TOMs)

- TOMs have been selected and implemented based on the risks defined in the course of the personal data processing risk analysis.
- TOMs might be implemented following customers' requirements.
- TOMs shall be reviewed and updated on a regular basis.

3.5. TECHNICAL AND ORGANIZATIONAL MEASURES EFFECTIVENESS REVIEW

TOMs shall be audited and reviewed for effectiveness in the course of internal audits and the results shall be kept.

3.6. PERSONAL DATA INVENTORY

The inventory of personal data processed by the Company shall be kept along with the lawful ground for processing.

3.7. PERSONNEL AUTHORIZED TO PROCESS PERSONAL DATA

The list of the personnel authorized to process personal data shall be kept.

3.8. PERSONAL DATA PROCESSING RULES AWARENESS

The personnel of the Company is obliged to take appropriate training concerning personal data processing rules adopted in the Company. The training materials and records shall be kept.

3.9. PERSONAL DATA BREACH NOTIFICATION PROCEDURE

In the event of a personal data breach, the Company shall follow the data breach notification process:

- Supervisory authority shall be notified: where feasible, not later than 72 hours.
- Data subject shall be notified
- Personal data breaches shall be documented, comprising the facts relating to the personal data breach, its effects and the remedial action taken.

3.10. CODE OF CONDUCT

Code of conduct has been adopted in the Company for the purpose of specifying the application of GDPR in the Company.

4. VERSION HISTORY

Revision	Date	Status	Author	Comments
1.0	2018-05-01	Approved	M.Fadeeva	Initial version Reviewed and approved by the team (A.Shirokov, A. Remnev, A. Pavlovsky)