

Appendix  
to the order of ANO  
"MDTO" from \_\_\_\_ № \_\_\_\_

**POLICY OF AN AUTONOMOUS NON-PROFIT ORGANISATION  
"MOSCOW DIRECTORATE OF TRANSPORT SERVICES REGARDING  
THE PROCESSING OF PERSONAL DATA**

**Moscow, 2023**

## 1. GENERAL PROVISIONS

1.1. The Policy of the Autonomous Non-Profit Organisation "Moscow Directorate of Transport Services" regarding the processing of personal data (hereinafter referred to as the Policy, ANO "MDTO") is developed in accordance with the Federal Laws of 27.07.2006 No. 149-FZ "On Information, Information Technologies and Information Protection" and No. 152-FZ

"On Personal Data", as well as and local regulatory acts of ANO "MDTO".

1.2. The Policy defines the procedure for handling documents containing personal data, measures to ensure the security of personal data received by ANO MDTO and its branches "Transport History and Culture Centre" and "Ruli" in the course of statutory activities, including on users of Internet sites, the Unified Digital Anti-Corruption Compliance Platform, the Service and the software application "Ruli".

1.3. ANO "MDTO", including in the person of its branches "Centre of History and Culture of Transport", "Ruli", is the Operator, which independently or jointly with other persons organises and (or) carries out processing of personal data, as well as determines the purposes of personal data processing, composition of personal data subject to processing, actions (operations) performed with personal data.

1.4. ANO MDTO is included in the Register of Operators maintained by the authorised federal authority for the protection of the rights of personal data subjects.

1.5. The Policy applies to all information received by the Operator in the course of its statutory activities, including information about users of websites in the network "Internet" (<https://mdto.ru/>, <https://mtmuseum.com/>, <https://i.transport.mos.ru/ruli>), the Unified Digital Anti-Corruption Compliance Platform (<https://комплаенс-платформа.пф>) and the software application "Ruli", owned by ANO "MDTO".

1.6. The most important goal and condition for carrying out its activities is the observance of human and civil rights and freedoms in the processing of personal data, including the protection of the rights to privacy, personal and family secrecy.

1.7. In order to provide convenience to users of Internet sites and software application, the Operator may establish a policy regarding the processing of personal data received when using a particular software product, service. The provisions of such documents should take into account the Policy and not contradict it.

1.8. The Policy is binding for all persons directly involved in the processing of personal data at ANO "MDTO". Violation of the Policy requirements entails liability in accordance with the legislation of the Russian Federation.

1.9. All personal data processed by ANO "MDTO", except for anonymised personal data and personal data made publicly available by the subject of personal data, is recognised as restricted access information.

## 2. BASIC CONCEPTS

**Automated processing of personal data** - processing of personal data with the help of computer facilities.

**Authorisation of the Registered User/User of the Service** - performance by the Registered User/User of the Service of a set of actions fixed in the User Agreement, the Adhesion Contract, as well as in the Ruli App, aimed at logging in to the account created in advance in order to identify the Registered User/User of the Service for further performance of certain actions on the websites and (or) use of the Service via the Ruli App.

**Authentication** - a set of measures to verify a person's ownership of an identifier (identifiers) by comparing it (them) with the information about the person possessed by the authenticator, and to establish the legality of the person's ownership of the identifier (identifiers) through the use of authenticating feature (features) within the authentication procedure, as a result of which the person is considered to be identified.

**Blocking of personal data** - temporary cessation of personal data processing (except for cases when processing is necessary to clarify personal data).

**Website** - a set of graphic and information materials, as well as programmes for electronic computers and databases, ensuring their availability on the Internet at one of the following network addresses:

[https://mdto.ru/;](https://mdto.ru/)

[https://i.transport.mos.ru/ruli/;](https://i.transport.mos.ru/ruli/)

[https://комплаенс-платформа.рф/a/start/;](https://комплаенс-платформа.рф/a/start/)

[https://mtmuseum.com/.](https://mtmuseum.com/)

**Adhesion Contract** - an agreement between the Operator and the Registered User/Service User (including all annexes thereto) regulating the relations on granting access to perform certain actions on the websites, the Unified Digital Anti-Corruption Compliance Platform, the Service and their use by the Registered User/Service User. The Adhesion Contract shall be deemed concluded from the date of completion of the User's registration on the website, the Unified Digital Anti-Corruption Compliance Platform, the Service and the use thereof by the Registered User/Service User.

platform or in the Ruli App (from the date of successful registration), necessarily accompanied by the User's acceptance of the terms and conditions of the User Agreement in full.

**Access to information** - the ability to obtain information and use it.

**Unified digital anti-corruption compliance platform is a** software package with basic functionality (with a fixed list of modules, integration of individual modules with related systems) designed for electronic computers and other computer devices for the purpose of implementing the Industry Programme for the Development of Anti-Corruption Compliance and Business Ethics in Moscow Transport Organisations, the right holder of which is the Operator.

**Registered User** - a natural person who has completed the registration and authorisation procedures on the website, the Unified Digital Anti-Corruption Compliance Platform and who has accepted the User Agreement in full, without reservations or exceptions, and has given consent to the processing of personal data.

**Personal data extraction** - actions aimed at constructing structured personal data from unstructured or weakly structured machine-readable documents.

**Modification of personal data** - actions aimed at modifying the values of personal data.

**Information system** - a set of information contained in databases and information technologies and technical means providing its processing.

**Information technologies** - processes, methods of searching, collecting, storing, processing, providing, disseminating information and ways of implementing such processes and methods.

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

**Confidentiality of information** is a requirement mandatory for a person who has access to certain information not to disclose such information to third parties without the consent of its owner.

**Accumulation of personal data** - actions aimed at forming an initial, unsystematised array of personal data.

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

**Information owner** - a person who has independently created information or who has obtained the right to authorise or restrict access to information determined on the basis of law or contract.

**Updating of personal data** - actions aimed at bringing the recorded personal data in compliance with the state of the displayed objects of the subject area.

**Processing of personal data** - any action (operation) or set of actions (operations) performed with or without the use of automation means with personal data, including collection, recording, systematisation, accumulation, storage, clarification (update, change), extraction, use, transfer (distribution, provision, access), depersonalisation, blocking, deletion, destruction of personal data.

**Operator** - a state authority, municipal authority, legal or natural person, independently or jointly with other persons organising and (or) carrying out processing of personal data, as well as determining the purposes of personal data processing, composition of personal data subject to processing, actions (operations) performed with personal data.

**Personal data transfer** - dissemination, provision or access to personal data.

**Personal data** - any information relating to a directly or indirectly defined or identifiable natural person (subject of personal data).

**Personal data retrieval** - actions, methods and procedures that enable the selection of certain personal data from a data set.

**User** - any visitor to the website, the Unified Digital Anti-Corruption Compliance Platform.

**User-Owner** - the owner of the vehicle, or another person acting on behalf of the owner of the vehicle on the basis of a letter of guarantee in accordance with the Contract of Adhesion, offered by him to other Users of the Service "Ruli" for short-term and long-term use.

**User-Friend** - a user of the vehicle of the User-Owner for short-term or long-term use.

**User of the Service** - a natural person who meets the requirements set out in the User Agreement, who has completed the registration and authorisation procedures in the Service "Ruli" and who has accepted the User Agreement in full, without reservations and exceptions, and has given his/her consent to the processing of personal data.

**Provision of personal data** - actions aimed at disclosure of personal data to a certain person or a certain circle of persons.

**Ruli application** - software application for electronic computing machines, mobile devices, tablets connected to the network

"Internet", providing the opportunity to register and authorise as a User of the Service and subsequent use of the Service.

**Disclosure of personal data** - providing access to personal data to an unlimited number of persons regardless of the purpose of obtaining said personal data.

**Dissemination** of personal data - actions aimed at disclosure of personal data to an indefinite number of persons.

**Registration of the User in the Service - the User's** performance of a set of actions fixed in the User Agreement, in the Accession Contract, as well as in the "Ruli" Appendix, aimed at the User's identification, creation of the Service User's account and further use of the Service.

**Website on the Internet** is a set of programmes for electronic computing machines and other information contained in the information system, access to which is provided through the Internet by domain names and (or) network addresses that allow identifying sites on the Internet.

**Collection of personal data** - actions aimed at obtaining personal data by the operator from the subjects of such data.

**Service "Ruli"** (hereinafter referred to as "Service") is a complex service of the Site Owner, provided to registered and authorised Users of the Service through the Application "Ruli" in the mode of twenty-four hours, seven days a week, without weekends and holidays, consisting in providing the Users of the Service with the opportunity to search (select) and book available cars, renting a personal vehicle for short-term and long-term lease to another individual on the principle of p2p (peerto-peer), with the use of "Ruli", or provided by the Site Owner through the Support Service.

**Network address** - an identifier in the data transmission network that defines the subscriber terminal or other means of communication included in the information system when providing telematic communication services.

**Systematisation of personal data** - actions aimed at combining and arranging personal data in a certain sequence.

**support service** - subdivision of the Operator, providing

consulting support for Users on the use of the web sites, the Service, and the Unified Digital Anti-Corruption Compliance Platform.

**Page of the website in the Internet** (hereinafter also referred to as the Internet page) - a part of the website in the Internet, which is accessed by an index consisting of the domain name and symbols defined by the owner of the website in the Internet.

**The subject of personal data** (hereinafter referred to as the Subject) is a natural person who is identified or identifiable through information relating to him/her directly or indirectly.

**Cross-border transfer of personal data** - transfer of personal data to the territory of a foreign country to a foreign government authority, a foreign natural person or a foreign legal entity.

**Deletion of personal data** - removal of personal data from information systems with preservation of the subsequent possibility of their recovery.

**Destruction of personal data** - 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 material carriers of personal data are destroyed.

**Clarification of personal data** - actions aimed at updating or changing personal data.

**Account means** a set of data about a person stored in the system of the Unified Digital Anti-Corruption Compliance Platform, website, Service, Ruli Application, which is necessary for his/her authentication.

**Storage of personal data** - the process of personal data transmission in time, associated with ensuring the invariability of the states of the material carrier of personal data.

### 3. LEGAL BASIS FOR PROCESSING PERSONAL DATA

3.1. The legal grounds for processing of personal data by the Operator are:  
Constitution of the Russian Federation;  
Civil Code of the Russian Federation; Tax Code of the  
Russian Federation; Labour Code of the Russian  
Federation;  
Law of the Russian Federation of 07.02.1992 No. 2300-1 "On Protection of  
Consumer Rights";

Federal law of 24.11.1995 № 181-FZ "On social  
Protection of Disabled Persons in the Russian Federation";

Federal Law of 24.07.1998 No. 125-FZ "On Compulsory Social Insurance  
against accidents at industrial accidents  
и occupational

diseases."

Federal Law of 15.12.2001 No. 167-FZ "On Compulsory Pension Insurance";  
Federal law of 27.07.2006 NO. 149-FZ "On Information, Information Technologies and Information Protection";

Federal Law of 27.07.2006 No. 152-FZ "On Personal Data" (hereinafter referred to as the "Personal Data Law");

Federal Law of 21.11.2011 No. 323-FZ "On the Fundamentals of Health Protection of Citizens in the Russian Federation";

Federal Law dated 06.12.2011 № 402-FZ "On Accounting";

Decree of the President of the Russian Federation of the President of the Russian Federation of the President of the Russian Federation" of 06.03.1997 № 188 "On Approval of the List of Confidential Information";

Resolution of the Government of the Russian Federation of 27.11.2006 № 719 "On Approval of the Regulations on Military Registration";

Resolution of the Government of the Russian Federation of 15.09.2008 № 687 "On Approval of the Regulation on the Peculiarities of Personal Data Processing Performed Without the Use of Means of Automation";

Resolution of the Government of the Russian Federation" from 01.11.2012 № 1119 "On Approval of Requirements for the Protection of Personal Data when Processed in Personal Data Information Systems";

Resolution of the State Committee of the Russian Federation on Statistics from 05.01.2004 № 1 "On Approval of Unified Forms of Primary Accounting Documentation on Accounting of Labour and its Payment";

Order of FSTEC of Russia No. 21 dated 18.02.2013 "On Approval of the Composition and Content of Organisational and Technical Measures to Ensure the Security of Personal Data when Processing in Personal Data Information Systems";

Order of the Federal Security Service of Russia No. 378 dd. 10.07.2014 "On Approval of the Composition and Content of Organisational and Technical Measures to Ensure the Security of Personal Data when Processing in Personal Data Information Systems Using Cryptographic Information Protection Means Required to Meet the Personal Data Protection Requirements Established by the Government of the Russian Federation for Each Level of Security";

Contract of adhesion; User Agreement;

Consent to the processing of personal data.

3.2. The Operator processes the User's personal data only if it is filled in and/or sent by the User himself/herself via special forms located on websites, the Unified Digital Anti-Corruption Compliance Platform, the Ruli App or sent to the Operator via e-mail. By filling in the relevant forms and (or) sending their personal data to the Operator, the User expresses their consent to this Policy.



3.3. The Operator processes anonymised data about the User if it is allowed in the User's browser settings (cookies and JavaScript technology enabled) and as a result of Internet statistics services.

3.4. The data subject independently decides whether to provide his/her personal data and gives consent freely, of his/her own free will and in his/her own interest.

#### **4. POLICY ACTION OVER TIME**

4.1. The Policy is applied by the Operator from the moment of its approval by the order of ANO MDTO until its cancellation and adoption of a new version of the Policy.

4.2. The Operator has the right to change the Policy at its discretion without notifying the User, the Subject. The current version is available on the Unified Digital Anti-Corruption Compliance Platform, the websites <https://mdto.ru/>, <https://mtmuseum.com/>, <https://i.transport.mos.ru/ruli>, in the Annex. "Steer."

4.3. The use of the Unified Digital Anti-Corruption Compliance Platform, websites, Service, Ruli Application means that the User unconditionally agrees with the Policy and all terms and conditions of processing personal data and other information. If the User does not agree with the Policy or any of its terms and conditions, the User shall independently stop using the Unified Digital Anti-Corruption Compliance Platform, website, Service, Ruli Application.

4.4. The User's registration on the Unified Digital Anti-Corruption Compliance Platform, the website, the Ruli App, acceptance of the User Agreement, conclusion of the Adhesion Contract, provision of personal data to the Operator, giving consent to the processing of personal data shall apply to all subsequent versions of the Policy. The User undertakes to familiarise himself/herself with the current version of the Policy on a regular basis.

4.5. The User's expressed consent to the processing of personal data and other information is simultaneously considered to be granted to third parties engaged by the Operator to assist in the operation of the Unified Digital Anti-Corruption Compliance Platform, the Service, the Ruli Application, and the website.

#### **5. PRINCIPLES OF PERSONAL DATA PROCESSING**

5.1. The processing of personal data is carried out on the grounds set out in the law.

5.2. The processing of personal data is limited to the achievement of specific, predetermined and legitimate purposes. Processing of personal data incompatible with the purposes of personal data collection is not allowed.

5.3. It is not allowed to merge databases containing personal data

data processed for incompatible purposes.

5.4. Only personal data that fulfils the purposes for which it is processed will be processed.

5.5. The content and scope of processed personal data correspond to the stated purposes of processing. The Operator shall take measures to prevent the request of excessive personal data in relation to the stated purposes of their processing.

5.6. When processing personal data, the accuracy of personal data, their sufficiency and, where necessary, relevance to the purposes of personal data processing are ensured. The Operator shall take the necessary measures and (or) ensure that they are taken to remove or clarify incomplete or inaccurate data.

5.7. Personal data shall be stored in a form that allows identification of the Subject. Processed personal data shall be destroyed or anonymised when the purposes of processing have been achieved or when it is no longer necessary to achieve these purposes, unless otherwise provided for by federal law.

## **6. RIGHTS AND OBLIGATIONS OF THE OPERATOR AND SUBJECTS OF PERSONAL DATA**

6.1. Categories of personal data subjects processed by the Operator:

- candidates for employment and employees of ANO "MDTO" by virtue of entering into labour contracts with the employer;
- employees of ANO "MDTO", whose personal data are processed for voluntary medical insurance;
- business partners and potential business partners of ANO "MDTO" - individuals, individual entrepreneurs, legal entities and their authorised representatives (Director General, person acting on the basis of a power of attorney, chief accountant and other authorised persons);
- students and employees upgrading their qualifications; authors of appeals, applications, complaints;
- users of the Service, the Ruli Application;
- persons with whom civil law contracts have been concluded;
- participants legal education by means of Unified digital anti-corruption compliance platform;
- users of the Unified Digital Anti-Corruption Compliance Platform; employees of organisations subordinate to the Department of Transport and development of the road and transport infrastructure of the city of Moscow.

6.2. The subject has the right to:

- independently decide on the provision of their personal data and consent to their processing, securing their consent by their signature in the contract, in a separate document or on the Internet (<https://mdto.ru/>,

<https://mtmuseum.com/>, <https://i.transport.mos.ru/ruli>), the Unified Digital Anti-Corruption Compliance Platform (<https://комплаенс-платформа.рф>) and the software application "Ruli";

provide information about personal data of relatives, provided that the relatives' consent to processing of their personal data is provided in writing;

withdraw consent to the processing of personal data, indicating the reason for withdrawal. The validity of the Subject's consent shall be terminated from the moment the Operator receives the said request in writing. If the Subject revokes his/her consent to personal data processing, the Operator shall have the right to continue processing personal data without the consent of the personal data subject if there are grounds specified in paragraphs 2 - 11 of Article 6(1), Article 10(2) and Article 11(2) of the Law "On Personal Data";

to receive information about the operator, its location, the availability of personal data relating to the relevant Subject, as well as to familiarise oneself with such personal data;

demand from the Operator to clarify his/her personal data, block or destroy it if the personal data is incomplete, outdated, inaccurate, illegally obtained or not necessary for the stated purpose of processing;

consent to the processing of personal and other data by the Operator. At any time, he/she may change the personal and other data provided by him/her by providing additional information containing personal data, either through the "Profile Settings" field of the Ruli Application or by contacting the Support Service, as well as by updating the "Personal Sheet" of the Unified Digital Anti-Corruption Compliance Platform;

get access to his/her personal data when submitting a written request to the Operator;

request a list of his/her personal data processed by the Operator;

request the Operator to provide information on the source of obtaining his/her personal data;

receive information about the timeframes for processing their personal data, including the timeframes for storing them;

require notification of all persons to whom incorrect or incomplete personal data have been previously communicated about all exceptions, corrections or additions made to them;

to appeal to the authorised body for the protection of the rights of personal data subjects or in court against unlawful acts or omissions in the processing of his/her personal data.

6.3. The subject is required to:

provide the Operator with true data about himself/herself;

to inform the Operator about the clarification (update, change) of his/her personal data.

6.4. An Entity that has passed to the Operator false information about itself or information about another Entity without the latter's consent shall be liable in accordance with the legislation of the Russian Federation.

6.5. The operator has the right to:

- receive from the Subject reliable information and (or) documents containing personal data;

- if the Subject revokes his/her consent to the processing of personal data, the Operator has the right to continue processing personal data without the Subject's consent if there are grounds specified in the Law "On Personal Data";

The Operator has the right to entrust the processing of personal data to another person with the Subject's consent, unless otherwise provided for by federal law, on the basis of a contract concluded with this person. The person processing personal data on behalf of the Operator shall comply with the principles and rules of personal data processing. The Operator's instruction shall define: the list of personal data, the list of actions (operations) with personal data to be performed by the person processing personal data on behalf of the Operator, the purposes of personal data processing, requirements for protection of processed personal data, requirements for notification of the Operator of unlawful processing of personal data, obligations of the person processing personal data on behalf of the Operator.

6.6. The operator is obligated to:

- provide the Subject, upon his/her request, with information concerning his/her personal data in an accessible form, and it must not contain personal data relating to other Subjects;

- organise the processing of personal data in accordance with the procedure established by the legislation of the Russian Federation;

- respond to appeals and requests of the Subjects and their legal representatives in accordance with the requirements of the Law "On Personal Data";

- publish or otherwise provide unrestricted access to the Personal Data Processing Policy;

- take legal, organisational and technical measures to protect personal data from unlawful or accidental access to them, destruction, modification, blocking, copying, provision, dissemination of personal data, as well as from other unlawful actions in relation to personal data;

- cease transfer (dissemination, provision, access) of personal data, stop processing and destroy personal data in the manner and cases stipulated by the Policy and the Law "On Personal Data";

- explain to the Subject the legal consequences of refusal to provide his/her personal data, if their provision is mandatory in accordance with the legislation of the Russian Federation;

- prior to the commencement of personal data processing (if personal data

received not from the Data Subject) to provide the Data Subject with the following information, except in cases provided for by Art. 18 para. 4 of the Law "On Personal Data": o name (surname, first name, patronymic) and address of the Operator or its representative; purpose of personal data processing and its legal basis; intended users of personal data; Subject's rights established by law; source of obtaining personal data;

block unlawfully processed personal data related to the Subject or ensure their blocking (if personal data processing is carried out by another person acting on behalf of the Operator) from the moment of application or receipt of a request for the period of verification, in case of detection of unlawful processing of personal data at the request of the Subject or his/her representative or at the request of the Subject or his/her representative or the authorised body for the protection of the rights of personal data subjects;

clarify personal data or ensure their clarification (if personal data processing is performed by another person acting on behalf of the Operator) within 7 working days from the date of submission of information and lift the blocking of personal data in case of confirmation of the fact of inaccuracy of personal data on the basis of information submitted by the Subject or his/her representative;

stop processing personal data or ensure its termination and destroy personal data or ensure its destruction in the manner and on the terms established by the legislation of the Russian Federation;

keep records of Subjects' requests, which should record Subjects' requests for information on personal data, as well as the facts of providing personal data in response to these requests;

when collecting personal data, including via the Internet, to ensure recording, systematisation, accumulation, storage, clarification (update, change), extraction of personal data of citizens of the Russian Federation using databases located on the territory of the Russian Federation;

not to disclose personal and other data of Users to third parties without their consent, except for cases provided for by the legislation of the Russian Federation and the terms and conditions of the User Agreement and Adhesion Contract, as well as except for third parties specified at <https://mdto.ru/ruli/3dparty.html> and engaged by the Operator to assist in the operation of the Service. The Operator has the right to change the composition of the third parties involved at any time at its own discretion. The Operator has the right to transfer personal data to enquiry and investigation authorities and other authorised bodies on the grounds provided for by the legislation of the Russian Federation.

## **7. COMPOSITION OF PERSONAL DATA AND PURPOSES OF THEIR COLLECTION AND PROCESSING**

7.1. The Operator collects and processes personal data directly provided by the User in the course of employment, contracting, use of the Unified Digital Anti-Corruption Compliance Platform, website, Service, Ruli App. In addition, the website collects and processes anonymised visitor data (including cookies) using Internet statistics services.

7.2. **For the purpose of information and reference provision**, the Operator collects and processes the following personal data of **job candidates and employees of ANO "MDTO"** by virtue of entering into labour contracts with the employer:

surname, first name, patronymic (if available), year and place of birth, address of residence or domicile, position, structural division, telephone number, email addresses, occupational information, and other personal data provided by the Subject.

7.3. The Operator collects and processes the following personal data of **the employees of ANO "MDTO"** by virtue of the conclusion of labour contracts with the employer:

surname, first name, patronymic (if available),  
past surname, first name, patronymic (if changed),  
gender,  
date of birth, place of birth,  
citizenship,  
residential address,  
address of the place of residence (if any),  
particulars on education, qualifications и о professional retraining,  
position,  
department, place of employment,  
length of service,  
marital status,  
data of the identity document (series, number, date of issue, by whom issued, division code),  
data of the foreign citizen's identity document, TIN,  
number insurance certificate state pension insurance of the state pension insurance,  
details of employment history or employment history,

details of the marriage certificate (divorce certificate), details of the child's birth certificate, amount of salary, income, other payments, bank (personal) account number, contact telephone numbers, e-mail address, information on family composition, information on education, qualifications and special knowledge or specialised training, information on the military registration of persons liable for military duty and persons subject to call-up for military service, information on the temporary disability of the employee.

**Job Candidates:**

surname, first name, patronymic (if available),  
past surname, first name, patronymic (if changed),  
gender,  
date of birth, place of birth,  
citizenship,  
residential address,  
address of the place of residence (if any),  
particulars on education, qualifications и о professional retraining,  
position,  
department, place of employment,  
length of service,  
marital status,  
data of the identity document (series, number, date of issue, by whom issued, division code),  
data of the foreign citizen's identity document, TIN,  
number insurance certificate state pension insurance of the state pension insurance,  
data of the labour book or information on labour activity, the amount of salary, income, other payments,  
contact telephone numbers, e-mail address,  
information on family composition,  
information on the military registration of persons liable for military duty and persons subject to call-up for military service.

**7.4. In order to verify potential business partners of ANO "MDTO",** the Operator collects and processes the following personal data of persons who are not employees of ANO "MDTO":

surname, first name, patronymic (if available),

---

past surname, first name, patronymic (if changed),  
 gender,  
 date of birth, place  
 of birth,  
 citizenship,  
 address of residence, address  
 of residence,  
 particulars on education, qualifications и о professional  
 retraining,  
 place of  
 employment,  
 position,  
 department,  
 data from procedural documents prepared in the course of constitutional, civil,  
 administrative, criminal and arbitration court proceedings,  
 data of the identity document (series, number, date of issue, by whom issued,  
 division code),  
 data of the foreign citizen's identity document, TIN,  
 SNILS,  
 data of the labour book or information on employment, information on  
 contact telephone numbers,  
 email address, information on  
 family composition.

**7.5. In order to organise training and professional development of employees,** the Operator collects and processes the following personal data of persons who are not employees of ANO "MDTO":

surname, first name, patronymic (if available),  
 past surname, first name, patronymic (if changed),  
 gender,  
 date of birth, place  
 of birth,  
 citizenship,  
 residential address,  
 address of the place of residence (if any),  
 particulars on education, qualifications и о professional  
 retraining,  
 place of  
 employment,  
 position,  
 department,  
 data of the identity document (series, number, date of issue, by whom issued,  
 division code),  
 TIN,  
 number insurance certificate state pension insurance of the state  
 pension insurance,  
 contact telephone numbers,



email address.

7.6. The following personal data is collected and processed via the website (mdto.ru) **in order to process applications, statements, complaints** received by ANO "MDTO", **including those** received by the Operator via feedback forms regarding violations of business conduct and ethics standards or corruption:

surname, first name, patronymic (if available); postal address; email address; contact telephone number;

other personal data provided by the Website User on his/her own initiative.

The category of Subjects is Users who have sent to the Operator via feedback forms appeals, applications, complaints about the facts of violation of the norms of business behaviour and ethics or manifestation of corruption.

7.7. The following personal data is collected and processed through the website, the Service, the Ruli App **in order to provide access to** and use of the Service, the Ruli App:

surname, first name, patronymic (if available); gender; date and place of birth; citizenship;

number of the Subject's identity document (or its substitute document), information on the date of issue of the said document and the issuing authority, photo of the main page and the page with registration;

address of registration at the place of residence and the address of actual residence; data on temporary registration (in the absence of registration at the place of residence)

the territory of the Russian Federation);

mobile phone number; email address;

data of the driving licence: series and number, name of the issuing authority, date of issue and expiry, category of the licence, photo of the front and back sides;

data on the vehicle owned by the user of the Service and its components on the Internet of ANO "MDTO" and its branches and statistical data on its use: model, make, state registration number, year of manufacture, technical inspection, information on the vehicle registration certificate, vehicle passport, availability of insurance and details of the insurance policy;

statistical data on the use of the vehicle by the User;

information o login/password for access к individual functions of the Ruli App and the website; of the User's photo image;

personal history of using the Service (including data on movements, geolocation, history of interaction between Users, etc.);  
 details of bank accounts; information on payment;  
 information about the User's participation in promotions of the Service;  
 IP address, MAC address of the User's devices;  
 other personal data related to the conclusion and performance of the Adhesion Contract and the User Agreement, including personal data of the owner of the vehicle, who transferred the vehicle to the Owner-User under the letter of guarantee within the framework of the Adhesion Contract.

The category of Subjects are Registered Users who have started using the Service, Ruli App.

7.8. The Operator **in order to ensure the use of the Service**, Application "Ruli" may process personal data for the following purposes, including but not limited to:

User's registration on the Service, in the Ruli App, verification; making decisions or performing other actions that have legal effect; and consequences in relation to the User and (or) other persons; provision of services of the Service, Ruli Application; distribution of materials and content of the website; collection of analytical data; processing of requests received by the Support Service and (or) e-mail, or sent to the Operator's legal address;  
 collection of debts from Users;  
 improving the quality of the Service, Ruli App; carrying out information/news/advertising mailings; User's participation in promotions, surveys conducted by the Operator by telephone, electronic and cellular communications;  
 establishment of feedback between the Operator and the User;  
 fulfilment of the Adhesion Contract;  
 insurance of the User-Owner's vehicle;  
 installation of the equipment on the vehicle of the User-Owner; contesting fines by the vehicle owner via the portal

"Public Services.

7.9. **In order to conclude civil law contracts** (sale of services and goods), the following personal data is collected and processed via the website (mtmuseum.com):

surname, first name, patronymic (if available); mobile phone number;  
 email address; delivery address;  
 place of work and position held;  
 information on bank cards and other means of non-cash payment.

Subjects are Users who have sent information to the Operator in the form set out on the website for the purchase of goods and services.

**7.10. For the purposes of legal education through the** Unified Digital Anti-Corruption Compliance Platform, the Operator collects and processes the following personal data:

surname, first name, patronymic (if available); date of birth;  
 pol;  
 place of work and position; e-mail address;  
 mobile phone number.

The category of Subjects is Users who have sent information to the Operator in the form established on the Unified Digital Anti-Corruption Compliance Platform for familiarisation, taking educational courses.

**7.11. For the purposes of direct use of the** Unified Digital Anti-Corruption Compliance Platform, the Operator collects and processes the following personal data:

surname, first name, patronymic (if available);  
 past surname, first name, patronymic (if changed),  
 date of birth;  
 addresses of registration and actual residence;  
 number of the Subject's identity document, information on the date of issue of the said document and the issuing authority;  
 nationality; place of birth; gender;  
 marital status;  
 education, including information on the issued document confirming it (number, series, date of issue);  
 place of employment and position;  
 data of the labour book or information on labour activity; military duty;  
 criminal prosecution;  
 administrative liability;  
 registration in narcological and psychoneurological dispensaries;  
 attitude to the privileged category of citizens;  
 TIN; SNILS;  
 series and number of the document for travelling outside the Russian Federation (date and issuing authority)  
 email address; telephone number.

**7.12. For the purpose of voluntary medical insurance of** employees of ANO "MDTO"      Operator      carries out      collection и      processing following

---

personal data:

surname, first name, patronymic (if available); date of birth;  
addresses of registration and actual residence; place of work and position;  
email address; telephone number.

7.13. The anonymised User data collected through Internet statistics services are used to collect information on User activities on the Unified Digital Anti-Corruption Compliance Platform, websites, the Service, the Ruli App, to improve the quality of the software products and their content.

## **8. CONDITIONS AND PROCEDURE FOR COLLECTION AND PROCESSING OF PERSONAL DATA**

8.1. B with regard to personal data User и The User's personal data and other information provided by the User are kept confidential.

8.2. Operator carries out following actions when processing of personal data in ANO "MDTO":

search of personal data; blocking of personal data; access to personal data; recording of personal data; extraction of personal data; modification of personal data; use of personal data; accumulation of personal data; non-automated processing personal data data (processing of personal data without the use of automation); depersonalisation of personal data; updating of personal data; transfer of personal data; provision of personal data; dissemination of personal data; collection of personal data; systematisation of personal data; deletion of personal data; destruction of personal data; clarification of personal data; storage of personal data.

- 8.3. The Operator uses the following methods of personal data processing:  
non-automated processing of personal data;  
exclusively automated processing personal data data  
with or without network transmission of the information  
obtained;  
mixed processing of personal data (with transmission via the internal network of the legal entity, as well as using the public network of the Internet).
- 8.4. The Operator uses the Subject's personal data solely for the purposes specified in Section 7 of the Policy.
- 8.5. In case of the Subject's request to the Operator to stop processing of personal data, the Operator shall, within a period not exceeding ten working days from the date of receipt of the relevant request by the Operator, stop processing of personal data or ensure the cessation of such processing (if such processing is carried out by a person who processes personal data), except for the cases provided for by paragraphs 2 - 11 of part 1 of Article 6, part 2 of Article 10 and part 2 of Article 11 of the Law "On Personal Data". 2, Article 10, paragraph 2 and Article 11, paragraph 2 of the Law on Personal Data. The said term may be extended, but not more than for five working days in case the operator sends a motivated notification to the Subject indicating the reasons for extending the term for providing the requested information.
- 8.6. The beginning of the period of personal data processing is considered to be the moment of their receipt by the Operator.
- 8.7. The Operator shall store personal data in a form that allows the identification of the Subject for no longer than required for the purposes of their processing.
- 8.8. The terms of processing and storage of the Subjects' personal data shall be determined in accordance with the legislation of the Russian Federation.
- 8.9. When storing personal data in accordance with part 5 of Article 18 of the Law "On Personal Data", the Operator is obliged to use databases located in the territory of the Russian Federation.
- 8.10. The Operator does not process special categories of personal data concerning race, nationality, political opinions, religious or philosophical beliefs, intimate life.
- 8.11. Trans-border transfer of personal data by the Operator is not carried out.

## **9. TRANSFER AND STORAGE OF PERSONAL DATA**

- 9.1. When transferring personal data, the Operator complies with the following requirements:
- 9.1.1. Personal data shall not be transferred to a third party without the written consent of the subject of personal data, except in cases when it is necessary in order to prevent a threat to his/her life and health, as well as in cases established by federal law.

9.1.2. Personal data shall not be transferred for commercial purposes without the written consent of the personal data subject. Processing of personal data of employees for the purpose of promotion of goods, works, services on the market by means of direct contacts with potential customers by means of communication means is allowed only with their prior consent.

9.1.3. Persons who have received personal data are warned that these data may be used only for the purposes for which they were communicated, and to require from these persons to confirm that this rule is observed. Persons who have received personal data are obliged to observe the regime of secrecy (confidentiality). This Policy does not apply to the exchange of employees' personal data in accordance with the procedure established by federal laws.

9.1.4. The transfer of personal data by the Operator is carried out in accordance with this Policy.

9.1.5. Access to personal data shall be allowed only to specially authorised persons, and these persons shall be entitled to receive only those employee's personal data that are necessary for the performance of a specific function.

9.1.6. The employer may not request information about the employee's state of health, except for information that is relevant to the issue of the employee's ability to perform the labour function.

9.1.7. Employee's personal data may be transferred to employee representatives in accordance with the procedure established by the Labour Code of the Russian Federation and limited only to those employee's personal data that are necessary for the said representatives to perform their function.

9.2. Storage and use of employees' personal data:

9.2.1. The Operator ensures protection of employees' personal data from unauthorised use or loss. Personal data of employees are processed and stored with the person responsible for personnel records at ANO "MDTO".

Personal data of persons who are not employees of ANO "MDTO" are processed and stored in the divisions of ANO "MDTO" that collected and accumulated them.

Personal files and personal cards of employees of ANO "MDTO" are kept in paper form in folders, stitched and numbered by pages. Personal files and personal cards are kept in the office of the person responsible for personnel records management in ANO "MDTO" in a specially designated cabinet ensuring protection from unauthorised access.

Personal data may also be stored electronically in a local computer network. Access to electronic databases containing personal data is ensured by a password system.

9.2.2. Personal data of employees may be received, further processed and transferred for storage both in hard copy and electronically - local computer network and computer network

**1C: Salary and Personnel programme.**

9.2.3. Access to software, as well as to personal data stored on electronic media, is regulated by local regulations of ANO "MDTO" and is performed by entering a personal user ID and password.

9.2.4. If the personal data was provided to the employer on the basis of federal law or if the personal data is publicly available) the employer shall provide the following information to the employee prior to the commencement of processing of such personal data:

- name (surname, first name, patronymic) and address of the operator or its representative;
- the purpose of personal data processing and its legal basis;
- the intended users of the personal data;
- established by the Law "On Personal Data" the rights of the subject of personal data.

9.2.5. Termination of personal data processing is carried out in the event of liquidation, reorganisation, changes in legislation or activities of ANO "MDTO", achievement of the objectives of personal data processing, expiration of document retention periods.

9.2.6. Storage of personal data after liquidation or reorganisation of ANO "MDTO" is carried out in accordance with the procedure established by Federal Law No. 125-FZ "On Archiving in the Russian Federation" dated 22.10.2004.

## **10. RULES OF ACCESS TO PERSONAL DATA**

10.1. Access to personal data is available to employees of ANO "MDTO" who are obliged to process it in connection with the performance of their official duties.

10.2. The list of employees of ANO "MDTO" who process personal data is approved by the management of ANO "MDTO".

10.3. The procedure for granting an employee access to personal data provides:

10.3.1. Submission by the employee's supervisor of a memo to the Responsible person specifying the employee's surname, name, patronymic, position and subdivision, the personal data processing action(s) in which the employee will participate, description of the personal data processing functions performed by the employee.

10.3.2. Familiarisation of the employee against signature with this Policy, other local regulatory acts of ANO "MDTO" on personal data processing, as well as local regulatory acts establishing procedures aimed at identifying violations of the legislation of the Russian Federation in the field of personal data processing and protection and eliminating the consequences of such violations.

10.3.3. Informing the employee about the categories of processed personal data, peculiarities and rules of personal data processing.

10.3.4. The fixing in writing of an employee's commitment that includes provisions:

10.3.4.1. employee's obligations to ensure confidentiality and security of personal data directly processed by the employee;

10.3.4.2. employee's obligation to cease processing of personal data that became known in connection with the performance of job duties, in case of termination of the labour contract with the employee;

10.3.4.3. briefing on the rules of personal data processing.

10.4. In case of dismissal, transfer to another position or change of job duties of the employee processing personal data, as well as change of organisational and staff structure, the manager of the employee processing personal data shall notify the Responsible Person thereof.

10.5. Upon dismissal of an employee who has access to personal data, documents and other media containing personal data shall be transferred to another employee who has access to personal data.

10.6. The responsible person organises inspections of compliance of personal data processing with the requirements to personal data protection established by the Law "On Personal Data", regulatory legal acts adopted in accordance with it and local acts of ANO "MDTO".

10.7. It is prohibited to allow employees to process personal data until they have undergone the access procedure.

10.8. Employees have access to their personal data in accordance with the Personal Data Law and labour legislation.

## **11. CLARIFICATION, BLOCKING AND DESTRUCTION OF PERSONAL DATA**

11.1. The purpose of clarification of personal data, including updates and changes, is to ensure the accuracy, completeness and relevance of personal data processed by the Operator.

11.2. Clarification of personal data is performed by the Operator on its own initiative, at the request of the Subject or his/her representative, at the request of the authorised body for the protection of the rights of personal data subjects in cases when it is established that personal data are incomplete, outdated, unreliable.

11.3. The purpose of blocking personal data is to temporarily stop the processing of personal data until the circumstances that caused the blocking of personal data are eliminated.

11.4. Blocking of personal data is carried out by the Operator by



at the request of the Data Subject or his/her representative, as well as at the request of the authorised body for the protection of the rights of personal data subjects in case of identification of unreliable personal data or unlawful actions with them.

11.5. Destruction of personal data is carried out by the operator:

within 30 days upon achievement of the purposes of personal data processing specified in Section 7 of the Policy, or within the same period in case of loss of necessity in achieving the purposes of personal data processing;

in case the Subject revokes his/her consent to the processing of his/her personal data;

at the request of the Subject or the authorised body for the protection of the rights of personal data subjects in case of revealing the facts of committing illegal actions with personal data, when it is impossible to eliminate the respective violations.

11.6. When destroying material carriers of personal data, an act on destruction of carriers containing personal data shall be drawn up.

## 12. PERSONAL DATA SECURITY

12.1. The Operator ensures the adoption of organisational, legal and technical measures necessary for the protection of Users' personal data and compliance with the requirements of federal legislation in the field of personal data protection.

12.2. In order to ensure the security of Users' personal data, the Operator has taken the following measures:

appointment of the person responsible for organisation of personal data processing, as well as identification of employees responsible for ensuring personal data security;

organisation of the processing of Users' personal data in a predominantly automatic manner (not freely accessible to the Operator's employees who are not involved in their processing);

limitation of the circle of persons who have access to personal data of Users;

familiarisation of the Subjects with the requirements of the legislation of the Russian Federation and the Operator's regulatory documents on processing and protection of personal data;

organisation of accounting, storage and circulation of carriers containing information with personal data;

identification of threats to personal data security during their processing, formation of threat models on their basis;

development, based on the threat model, of the personal data protection system;

verification of the readiness and efficiency of the use of protection tools information;

differentiation access users к information resources и

software and hardware means of information processing;

registration и record user activities users  
information of personal data information systems;

use of anti-virus systems and other means of information protection; work of the analytical group to assess threats to the security of personal information.

data,

periodic check of the personal data protection systems' relevance; restriction of unauthorised persons on the Operator's territory; round-the-clock security of the premises;

individual briefing employees on issues  
protection of personal data.

12.3. Other rights and obligations of the Operator shall be determined by the legislation of the Russian Federation.

12.4. The Operator's personal data base is located in Moscow, Russian Federation.

### **13. FINAL PROVISIONS**

13.1. Other rights and obligations of the Operator are defined by the legislation of the Russian Federation.

13.2. Control over the fulfilment of the Policy requirements shall be carried out by the person responsible for ensuring the security of the Operator's personal data.

13.3. Responsibility of the Operator's employees and other persons having access to personal data for failure to comply with the requirements of the regulations governing the processing and protection of personal data shall be determined in accordance with the legislation of the Russian Federation and the Operator's internal documents.

13.4. By agreeing to the terms of the Policy, the User consents to the processing of personal and other data with his/her own will and in his/her own interest.

13.5. By refusing to provide personal data and other information necessary for the use of the Service, the Unified Digital Anti-Corruption Compliance Platform, the User also refuses to use them (individual components).

13.6. The User may obtain any clarifications on matters of interest regarding the processing of his/her personal data by contacting the Operator via e-mail, or the Support Service.

13.7. This document will reflect any changes to the Operator's personal data processing policy. The Policy is valid indefinitely until it is replaced by a new version.

---