

Privacy policy

Last Updated: - "01" November 2020

General Provisions

1.1. This document defines the policy of Solvery Education LLC (TIN 7814781250) (hereinafter referred to as the Company) in relation to the processing of personal data and sets out the system of basic principles applied in relation to the processing of personal data in the Company and is developed in accordance with the Constitution of the Russian Federation, the Labor Code Of the Russian Federation, the Civil Code of the Russian Federation, Federal Law of July 27, 2006 No. 149-FZ "On Information, Information Technologies and Information Protection", Federal Law of July 27, 2006 No. 152-FZ "On Personal Data", Resolution of the Government of the Russian Federation dated 01.11.2012 No. 1119 "On approval of requirements for the protection of personal data during their processing in personal data information systems", other federal laws and regulations.

1.2. This Policy applies to all operations performed in the Company with personal data using automation tools or without using them.

1.3. This Policy is mandatory for familiarization and execution by all persons admitted to the processing of personal data in the Company, and by persons participating in the organization of processes for processing and ensuring the security of personal data in the Company.

1.4. This Policy has been drawn up taking into account the requirements of the Constitution of the Russian Federation, the Council of Europe Convention No. 108 on the protection of individuals in connection with the automatic processing of personal data and the Federal Law of the Russian Federation "On Personal Data" No. 152-FZ of July 27, 2006.

1.5. This Policy is subject to updating in case of changes in the legislation of the Russian Federation on personal data.

2. Introduction

2.1. The company is the operator of personal data.

2.2. An important condition for the implementation of the goals of the Company's activities is to ensure the protection of the rights and freedoms of the subject of personal data when processing his personal data.

2.3. The Company has developed and put into effect documents that establish the procedure for processing and ensuring the security of personal data, which ensure compliance with the requirements of the Federal Law of the Russian Federation "On Personal Data" No. 152-FZ of July 27, 2006 and the regulatory legal acts adopted in accordance with it.

3. Purposes of data processing

We process your personal data solely for the purposes for which they were provided, including:

- registering you on our sites to provide you with access to individual sections;
- providing you with information about the Company, our services and events;
- communication with you when you contact us;
- organizing your participation in our events and surveys;
- sending you our news materials;
- fulfillment of powers and duties assigned to the Company by the legislation of the Russian Federation;
- for other purposes with your consent.

We process technical data for:

- ensuring the functioning and security of our sites;
- improving the quality of our sites.

We do not post your personal data in publicly available sources. We do not make decisions that give rise to legal consequences for you or otherwise affect your rights and legitimate interests on the basis of solely automated processing of personal data.

4. Principles and conditions for the processing of personal data in the Company

4.1. The company, as an operator, processes the following personal data:

personal data that you provide to us when filling out information fields on our sites, including when filling out a contact form, when subscribing to a newsletter, when registering for events;

personal data and other information contained in messages you send to us;

personal data that you provide through our job vacancies and internships website;

technical data that is automatically transmitted by the device with which you use our sites, including device specifications, IP address, information stored in cookies that were sent to your device, browser information, date and time access to the site, the addresses of the requested pages and other similar information;

personal data of applicants for filling vacant positions - in the composition and within the timeframe necessary for the Company to make a decision on hiring or refusing to hire, with the consent of personal data subjects, as well as for the formation of a personnel reserve with the consent of personal data subjects;

personal data of employees who are or were in labor relations with the Company - in the composition and within the timeframe necessary to achieve the goals stipulated by the legislation of the Russian Federation, the implementation and implementation of the functions, powers and duties imposed by the legislation of the Russian Federation on the Company, to form a personnel reserve with the consent of personal subjects data, as well as for the conclusion and execution of an agreement to which the subject of personal data is a party or a beneficiary or guarantor, including for the purpose of providing insurance with the consent of the subjects of personal data;

personal data of relatives of employees of the Company - in the composition and within the timeframes necessary for the implementation and implementation of functions, powers and obligations imposed by the legislation of the Russian Federation on the Company, the exercise of the rights and legitimate interests of the Company, as well as for the conclusion and execution of a contract, a party to which is either a beneficiary or a guarantor of to whom the subject of personal data is, including for the purpose of providing insurance with the consent of the subjects of personal data;

personal data of representatives of the Company's suppliers - in the composition and within the time frame required to interact with suppliers with the consent of the subjects of personal data;

personal data of persons associated with accidents - in the composition and within the timeframe necessary to achieve the goals stipulated by the legislation of the Russian Federation, the implementation and implementation of the functions, powers and duties assigned by the legislation of the Russian Federation to the Company;

personal data of persons who receive income, but are not in labor relations with the Company, in the composition and within the time frame necessary to achieve the goals provided for by the legislation of the Russian Federation, the implementation and implementation of the functions, powers and duties imposed by the legislation of the Russian Federation on the Company;

personal data of representatives of potential and existing customers - in the composition and within the time frame required to interact with potential and existing customers, with the consent of the subjects of personal data;

personal data of representatives of partners - in the composition and within the time frame required for interaction with partners, with the consent of the subjects of personal data.

4.2. The terms for processing personal data are determined taking into account: the established purposes of processing personal data;

terms of validity of contracts with subjects of personal data and consent of subjects of personal data to the processing of their personal data.

4.3. The company processes personal data on a legal and fair basis.

4.4. When processing personal data, their accuracy, sufficiency, and, if necessary, relevance in relation to the purposes of processing personal data are ensured.

4.5. The company does not disclose to third parties and does not distribute personal data without the consent of the subject of personal data (unless otherwise provided by federal law of the Russian Federation).

4.6. The company does not process biometric personal data.

4.7. The company carries out cross-border transfer of personal data. At the same time, the Company complies with the requirements for the implementation of cross-border transfer of personal data provided for by the Federal Law of the Russian Federation "On Personal Data" No. 152-FZ of July 27, 2006.

4.8. The Company does not make decisions that give rise to legal consequences in relation to the subject of personal data or otherwise affect his rights and legitimate interests, based solely on automated processing of personal data.

4.9. The company processes personal data using automation tools and without using them. At the same time, the Company fulfills the requirements for automated and non-automated processing of personal data provided for by the Federal Law of the Russian Federation "On Personal Data" No. 152-FZ of July 27, 2006 and the regulatory legal acts adopted in accordance with it.

5. Legal basis for the processing of personal data.

The processing of personal data in the Company is carried out on the basis of the following federal laws and regulatory legal acts:

1) the Constitution of the Russian Federation.

2) the Labor Code of the Russian Federation.

3) Federal Law of July 27, 2006 No. 152-FZ "On Personal Data".

4) Federal Law "On Information, Information Technologies and Information Protection" dated July 27, 2006 N 149-FZ.

5) Regulations on the features of personal data processing carried out without the use of automation tools. Approved by Resolution of the Government of the Russian Federation dated September 15, 2008 No. 687.

6) Resolutions of November 1, 2012 N 1119 on the approval of requirements for the protection of personal data when processing them in personal data information systems.

7) Order of the FSTEC of Russia No. 55, FSB of Russia No. 86, Ministry of Information Technologies and Communications of Russia No. 20 dated February 13, 2008 "On approval of the Procedure for the classification of personal data information systems."

8) Order of the FSTEC of Russia dated February 18, 2013 No. 21 "On approval of the composition and content of organizational and technical measures to ensure the security of personal data when processing them in personal data information systems."

9) Order of Roskomnadzor dated September 05, 2013 No. 996 "On approval of requirements and methods for anonymization of personal data."

10) Order of the Federal Tax Service of November 17, 2010 No. MMB-7-3 / 611 "On approval of the form of information on the income of individuals and recommendations for filling it out, the format of information on the income of individuals in electronic form, reference books."

11) Other regulatory legal acts of the Russian Federation and regulatory documents of authorized government bodies.

6. Rights of subjects of personal data processed by the Company

The personal data subject has the right to receive information regarding the processing of his personal data. To obtain this information, the subject of personal data can send a written request (the request can also be sent in the form of an electronic document and signed with an electronic signature) to the email address: info @ .io or to the address: RF in the manner prescribed by Article 14 of the Federal Law of the Russian Federation "On personal data" No. 152-Φ3 dated July 27, 2006

7. Performance of the operator's duties by the Company

7.1. The company receives personal data from subjects of personal data and from third parties (persons who are not subjects of personal data). At the same time, the Company fulfills the obligations stipulated by the Federal Law of the Russian Federation "On Personal Data" No. 152-FZ of July 27, 2006 and the Labor Code of the Russian Federation when collecting personal data.

7.2. The company stops processing personal data in the following cases:

- upon the occurrence of conditions for the termination of the processing of personal data or after the expiration of the established time frame
- upon reaching the goals of their processing or in case of loss of the need to achieve these goals;
- at the request of the subject of personal data, if the personal data processed by the Company are incomplete, outdated, inaccurate, illegally obtained or are not necessary for the stated purpose of processing;
- in the event of unlawful processing of personal data, if it is impossible to ensure the legality of the processing of personal data;
- if the subject of personal data withdraws consent to the processing of his personal data or expires of such consent (if the personal data is processed by the Company solely on the basis of the consent of the subject of personal data);
- in case of liquidation of the Company.

7.3. The company has taken the following measures to ensure the fulfillment of the obligations stipulated by the Federal Law of the Russian Federation "On Personal Data" No. 152-FZ dated July 27, 2006 and the regulatory legal acts adopted in accordance with it:

- a person responsible for organizing the processing of personal data has been appointed;
- local acts were issued on the processing and security of personal data, as well as local acts establishing procedures aimed at preventing and detecting violations of the legislation of the Russian Federation, eliminating the consequences of such violations:
- Regulation on the processing of personal data;
- this Policy;
- other local acts on the processing and security of personal data;
- legal, organizational and technical measures were applied to ensure the security of personal data;
- internal control of the compliance of the processing of personal data with the requirements of the Federal Law of the Russian Federation "On Personal Data" No. 152-FZ dated July 27, 2006 and the regulatory legal acts adopted in accordance with it, this Policy, local acts of the Company is carried out;
- an assessment of the harm that may be caused to subjects of personal data in case of violation of the requirements of federal legislation on personal data was

carried out, the ratio of this harm and the measures taken by the Company aimed at ensuring the fulfillment of the obligations stipulated by the requirements of the Federal Law of the Russian Federation "On Personal Data" No. 152-FZ of July 27, 2006 and the regulatory legal acts adopted in accordance with it;

- employees of the Company who directly process personal data are familiar with the provisions of the Federal Law of the Russian Federation "On Personal Data" No. 152-FZ dated July 27, 2006 and the regulatory legal acts adopted in accordance with it, this Policy and local acts of the Company on the processing of personal data.

8. The Company implements the following requirements for the protection of personal data:

a regime has been organized to ensure the security of the premises in which the information systems are located, preventing the possibility of uncontrolled entry or stay in these premises of persons who do not have the right to access these premises;

implementation of ensuring the safety of personal data carriers;

the head of the Company approved a document defining the list of persons whose access to personal data processed in the information system is necessary for them to perform their official (labor) duties;

information security tools are used that have passed the procedure for assessing compliance with the requirements of the legislation of the Russian Federation in the field of information security;

the requirements established by the Decree of the Government of the Russian Federation of September 15, 2008 No. 687 "On approval of the Regulation on the specifics of personal data processing carried out without the use of automation tools" were implemented.

9. Cookies

We use cookies. Cookies are small text files that are placed on the hard drives of your devices when you use various sites, designed to help you customize the user interface according to your preferences.

Most browsers allow you to refuse to receive cookies and delete them from your device's hard drive.

10. Links to third party sites

Our sites may contain links to third party sites and services that we do not control. We are not responsible for the security or privacy of any information collected by third party sites or services.

11. Change of Policy

We may update the Policy as needed. We recommend that you periodically check the relevance of this Policy. By continuing to use our sites after changing the Policy, you agree to the changes made.

If you have any questions about this Policy, please contact the person responsible for organizing the processing of personal data in the Company by sending a letter marked "Request for personal data" to the email address: info @ .io or to the address: RF.