

APPROVED by
President A.A. Kuratova
August 1, 2025

Policy of Autonomous Non-Profit Organization "Center for Social and Psychological Assistance and Support for Women "Rare Women" regarding the Personal Data Processing

1. General

1. This Policy of Autonomous Non-Profit Organization "Center for Social and Psychological Assistance and Support for Women "Rare Women" (hereinafter referred to as ANO "Center for Social and Psychological Assistance and Support for Women "Rare Women" or Operator). regarding the Personal Data Processing (hereinafter referred to as the Policy) has been developed in accordance with the requirements of clause 2, part 1, article 18.1 of Federal Law No. 152-FZ of July 27, 2006, "On Personal Data," in order to ensure the protection of human and civil rights and freedoms when Personal Data Processing, including the protection of the rights to privacy and personal and family secrets.

1.2. The Policy shall apply to all Personal Data processed by ANO "Center for Social and Psychological Assistance and Support for Women "Rare Women."

1.3. The Policy shall apply to relationships in the field of Personal Data Processing that arose for the Operator both before and after the approval of this Policy.

1.4. In accordance with the requirements of Part 2 of Article 18.1 of the Personal Data Act, this Policy shall be published in the public domain on the Operator's website on the Internet.

1.5 Key terms used in the Policy:

Personal Data mean any information relating directly or indirectly to a specific or identifiable natural person (Personal Data Subject);

Personal Data Operator means a state body, municipal body, legal entity or individual who, independently or jointly with other persons, organises and (or) carries out the Personal Data Processing, as well as determines the purposes of Personal Data Processing, the composition of Personal Data to be processed, and the actions (operations) performed with Personal Data;

Personal Data Processing means any action (operation) or set of actions (operations) with Personal Data, performed with or without the use of automation tools. The Personal Data Processing includes, among other things:

- collection;
- recording;
- systematization;
- accumulation;
- storage;
- refinement (updating, modification);
- retrieval;
- use;
- transfer (distribution, provision, access);
- depersonalization;
- blocking;
- deletion;
- destruction;

Automated Personal Data Processing means Personal Data Processing using computer technology;

Personal Data Distribution means actions aimed at disclosing Personal Data to an indefinite circle of persons;

Personal Data Provision means actions aimed at disclosing Personal Data to a specific person or a specific group of persons;

Personal Data Blocking means temporary cessation of Personal Data Processing (except in cases where processing is necessary to clarify Personal Data);

Personal Data Destruction means actions that make it impossible to restore the content of Personal Data in the Personal Data Information System and/or that destroy the physical media containing Personal Data;

Personal Data Depersonalization means actions that make it impossible to determine the ownership of Personal Data by a specific Personal Data Subject without using additional information;

Personal Data Information System means a set of Personal Data contained in databases and information technologies and technical means that ensure their processing.

1.6. Basic rights and obligations of the Operator.

1.6.1. The Operator shall have the right to:

- 1) Independently determine the composition and list of measures necessary and sufficient to ensure the fulfillment of the obligations provided for by the Personal Data Act and regulatory legal acts adopted in accordance with it, unless otherwise provided by the Personal Data Act or other federal laws;
- 2) Entrust the Personal Data Processing to another person with the consent of the Personal Data Subject, unless otherwise provided by federal law, on the basis of a contract concluded with that person. A person Personal Data Processing on behalf of the Operator shall comply with the principles and rules for the Personal Data Processing provided for by the Personal Data Act, to maintain the confidentiality of Personal Data, and to take the necessary measures to ensure the fulfillment of the obligations provided for by the Personal Data Act;
- 3) If the Personal Data Subject withdraws his/her consent to the Personal Data Processing, the Operator shall have the right to continue Personal Data Processing without the consent of the Personal Data Subject if there are grounds specified in the Personal Data Act.

1.6.2. The Operator shall:

- 1) Organize the Personal Data Processing in accordance with the requirements of the Personal Data Act;
- 2) Respond to requests and inquiries from Personal Data Subjects and their legal representatives in accordance with the requirements of the Personal Data Act;
- 3) Provide the authorized body for the protection of the rights of Personal Data Subjects (the Federal Service for Supervision of Communications, Information Technology and Mass Media (Roskomnadzor)) with the necessary information at the request of this body within 10 working days from the date of receipt of such a request. This period may be extended, but not by more than five working days. To do so, the Operator must send Roskomnadzor a reasoned notification stating the reasons for extending the deadline for providing the requested information;
- 4) In accordance with the procedure established by the federal executive authority authorized in the field of security, ensure interaction with the state system for detecting, preventing, and eliminating the consequences of computer attacks on the information resources of the Russian Federation, including informing it of computer incidents that have resulted in the unlawful transfer (provision, distribution, access) of Personal Data.

1.7. Basic rights of the Personal Data Subject. The Personal Data Subject shall have the right to:

- 1) Receive information regarding the processing of their Personal Data, except in cases provided for by federal laws. The information is provided to the Personal Data Subject by the Operator in an accessible form and must not contain Personal Data relating to other Personal Data Subjects, except in cases where there are legal grounds for disclosing such Personal Data. The list of information and the procedure for obtaining it are established by the Personal Data Act;
- 2) Request that the operator clarify, block, or destroy their Personal Data if the Personal Data is incomplete, outdated, inaccurate, illegally obtained, or unnecessary for the stated purpose of processing, as well as to take measures provided for by law to protect their rights;

- 3) Give prior consent to the Personal Data Processing for the purpose of promoting goods, works, and services on the market;
 - 4) Appeal to Roskomnadzor or in court against unlawful actions or inaction of the Operator in the processing of their Personal Data.
- 1.8. Compliance with the requirements of this Policy is monitored by an authorized person responsible for organizing the Personal Data Processing at the Operator.
- 1.9 Responsibility for violating the requirements of the legislation of the Russian Federation and the regulatory acts of ANO "Center for Social and Psychological Assistance and Support for Women "Rare Women" in the field of Personal Data Processing and protection is determined in accordance with the legislation of the Russian Federation.

2. Purposes of Personal Data Processing

- 2.1. The Personal Data Processing shall be limited to the achievement of specific, predetermined, and lawful purposes. The Personal Data Processing that is incompatible with the purposes of collecting Personal Data shall not be permitted.
2. Only Personal Data that meets the purposes of its processing shall be processed.
- 2.3. The Operator processes Personal Data for the following purposes:
- To carry out its activities in accordance with the Charter of ANO "Center for Social and Psychological Assistance and Support for Women "Rare Women" by assisting in the socio-cultural rehabilitation and habilitation of families and patients with severe chronic and rare (orphan) diseases;
 - To achieve the statutory goals of ANO "Center for Social and Psychological Assistance and Support for Women "Rare Women" by carrying out charitable activities; to receive donations in cash and in kind by ANO "Center for Social and Psychological Assistance and Support for Women "Rare Women";
 - Enforcement of labor legislation in the context of labor and other directly related relations, including: assisting employees in finding employment, obtaining education, and advancing in their careers; attracting and selecting candidates for employment with the Operator; ensuring the personal safety of employees; monitoring the quantity and quality of work performed; ensuring the safety of property; maintaining personnel and accounting records, completing and submitting the required reporting forms to the authorized bodies, organizing the registration of employees in individual (personalized) accounts in the mandatory pension insurance and mandatory social insurance systems.
- 2.4. The processing of employees' Personal Data may be carried out solely for the purpose of ensuring compliance with laws and other regulatory legal acts.

3. Legal Grounds for Personal Data Processing

- 3.1. The legal basis for the Personal Data Processing is a set of regulatory legal acts, in accordance with which and in compliance with which the Operator processes Personal Data, including:
- The Constitution of the Russian Federation;
 - The Civil Code of the Russian Federation;
 - Labor Code of the Russian Federation;
 - Tax Code of the Russian Federation;
 - Federal Law No. 152-FZ of July 27, 2006, "On Personal Data";
 - Federal Law No. 7-FZ of January 12, 1996, "On Non-Profit Organizations";
 - Federal Law No. 135-FZ of August 11, 1995, "On Charitable Activities (Volunteering)";
 - Federal Law No. 149-FZ of July 27, 2006, "On Information, Information Technologies, and Information Protection";
 - Federal Law No. 402-FZ of December 6, 2011, "On Accounting";
 - Federal Law No. 167-FZ of December 15, 2001, "On Mandatory Pension Insurance in the Russian Federation";
 - Federal Law No. 125-FZ of October 22, 2004, "On Archival Affairs in the Russian Federation";

- Other regulatory legal acts governing relations related to the Operator's activities.
- 3.2. The legal basis for the Personal Data Processing also includes:
- The Charter;
 - Contracts concluded between the Operator and Personal Data Subjects;
 - Consent of Personal Data Subjects to the processing of their Personal Data.

4. Scope and Categories of Personal Data Processed, Categories of Personal Data Subjects

4.1. The content and scope of the Personal Data processed must correspond to the stated purposes of processing provided for in section 2 of this Policy. The Personal Data processed must not be excessive in relation to the stated purposes of its processing.

4. The operator may process Personal Data of the following categories of Personal Data Subjects.

4.2.1. Candidates for employment with the Operator - for the purposes of complying with labor legislation within the framework of labor and other directly related relations:

- Surname, name, patronymic;
- Gender;
- Citizenship;
- Date and place of birth;
- Contact details;
- Information about education, work experience, qualifications;
- Other Personal Data provided by candidates in their resumes and cover letters.

4.2.2. Employees and former employees of the Operator - for the purposes of complying with labor legislation within the framework of labor and other directly related relations:

- Surname, name, patronymic;
- Gender;
- Citizenship;
- Date and place of birth;
- Image (photograph);
- Passport details;
- Registered address of residence;
- Actual address of residence;
- Contact details;
- Individual taxpayer identification number;
- Individual personal account insurance number (SNILS);
- Information about education, qualifications, professional training, and professional development;
- Marital status, presence of children, family ties;
- Information about employment, including incentives, awards, and/or disciplinary actions;
- Marriage registration data;
- Information about military registration;
- Disability information;
- Information about alimony payments;
- Information about income from previous employment;
- Other Personal Data provided by employees in accordance with the requirements of labor legislation.

4.2.3. Family members of the Operator's employees - for the purposes of complying with labor legislation within the framework of labor and other directly related relationships:

- Surname, name, patronymic;
- Degree of kinship;
- Year of birth;

• Other Personal Data provided by employees in accordance with the requirements of labor legislation.

4.2.4. Beneficiaries (participants in the charity program, their family members suffering from severe and rare orphan diseases) - to achieve the statutory goals of socio-cultural rehabilitation and habilitation of families and patients with severe chronic and rare (orphan) diseases, to contribute to the costs associated with the diagnosis, treatment, rehabilitation, habilitation, and social adaptation of Beneficiaries; to attract public attention and resources to provide assistance to beneficiaries; to provide other charitable assistance and support to beneficiaries; fulfilling the requirements of federal legislation on the disclosure of information about the activities of charitable organizations, publishing information about the activities of ANO "Center for Social and Psychological Assistance and Support for Women "Rare Women" in publicly available sources, including on the Operator's website (hereinafter referred to as the Website):

- Surname, name, patronymic (if any);
- Information about the main identity document (series, number, date of issue,
- Name of the issuing authority, department code), if available;
- Date of birth;
- Place of birth;
- Registered address;
- Address of residence;
- Citizenship (residency);
- Photo of the Personal Data Subject allowing their identification;
- Bank details (if reimbursement of expenses is necessary);
- Information about serious chronic and rare diseases of their children (about their own diseases, for women suffering from rare (orphan) diseases);
- Information about disability;
- Phone number, email address, and other contact details (if available);
- Information about registration with a specialized fund;
- Social information: number and age of children (including children in care), marital status, religious affiliation (optional), information about education level and type of education, information about profession and employment status (employed/unemployed, place of work, position), family category, hobbies (interests, passions), links to social media accounts.

4.2.5. Charitable donors (individuals) - for the implementation of the statutory objectives of ANO "Center for Social and Psychological Assistance and Support for Women "Rare Women" through charitable activities; receiving donations in cash and in kind, including the conclusion and execution of donation agreements; fulfilling the requirements of federal legislation on the disclosure of information about the activities of charitable organizations, publishing information about the activities of ANO "Center for Social and Psychological Assistance and Support for Women "Rare Women" in publicly available sources, including on the Website:

- Surname, name, patronymic;
- Date and place of birth;
- Passport details;
- Registered address of residence;
- Contact details.

4.2.6. Visitors to the Website - for the implementation of the statutory objectives of ANO "Center for Social and Psychological Assistance and Support for Women "Rare Women" through charitable activities; receiving donations in cash and in kind, including the conclusion and execution of donation agreements on the Website, drawing public attention to issues of treatment and social support for patients with severe chronic and rare (orphan) diseases:

- IP address;

- Browser and language data;
 - Device specifications;
 - Date and time of access to the Site;
 - Requested pages;
 - Name (when making a donation on the Website);
 - Email address (when making a donation on the Website).
- 4.2.7. The Operator's counterparties (individuals) - for the purposes of carrying out their activities in accordance with the Charter of ANO "Center for Social and Psychological Assistance and Support for Women "Rare Women":
- Surname, name, patronymic;
 - Date and place of birth;
 - Passport details;
 - Registered address;
 - Contact details;
 - Information about education/qualifications;
 - Individual taxpayer identification number;
 - Bank account number;
 - Other Personal Data provided by customers and counterparties (individuals) necessary for the conclusion and execution of contracts.
- 4.2.8. Representatives (employees) of the Operator's counterparties (legal entities) - for the purposes of carrying out their activities in accordance with the Charter of ANO "Center for Social and Psychological Assistance and Support for Women "Rare Women":
- Surname, name, patronymic;
 - Passport details;
 - Contact details;
 - Position to be filled;
 - Other Personal Data provided by representatives (employees) of clients and contractors necessary for the conclusion and execution of contracts.
- 4.3. The Operator processes biometric Personal Data (information that characterizes the physiological and biological characteristics of a person, on the basis of which their identity can be established) in accordance with the legislation of the Russian Federation.
- 4.4. The Operator does not process special categories of Personal Data relating to race, nationality, political views, religious or philosophical beliefs, health, or intimate life, except in cases provided for by the legislation of the Russian Federation.

5. Procedure and Conditions for the Personal Data Processing

- 5.1. The Operator processes Personal Data in accordance with the requirements of the legislation of the Russian Federation.
- 5.2. Personal Data is processed with the consent of the subjects of Personal Data to the processing of their Personal Data, as well as without such consent in cases provided for by the legislation of the Russian Federation.
- 5.3. The Operator processes Personal Data for each purpose of processing in the following ways:
- Non-Automated Personal Data Processing;
 - Automated Personal Data Processing with or without the transfer of the information received via information and telecommunications networks;
 - Mixed Personal Data Processing.
- 5.4. The Operator's employees whose job responsibilities include the Personal Data Processing are authorized to process Personal Data.
- 5.5. The Personal Data Processing for each processing purpose specified in clause 2.3 of the Policy is carried out by:
- Obtaining Personal Data in oral and written form directly from the subjects of Personal Data;
 - Entering Personal Data into the Operator's logs, registers, and information systems;

- Using other methods of Personal Data Processing.

5.6. Disclosure to third parties and Personal Data Distribution without the consent of the Personal Data Subject is not permitted, unless otherwise provided by federal law. Consent to the Personal Data Processing permitted by the Personal Data Subject for distribution shall be formalized separately from other consents of the Personal Data Subject to the processing of his or her Personal Data.

5.7. ANO "Center for Social and Psychological Assistance and Support for Women "Rare Women" is a person who provides Personal Data to other operators in accordance with the requirements of the law, which include, without limitation:

- Authorities and state extrabudgetary funds to which the funds of Employees and Contractors are transferred or funds for crediting to the accounts of Employees and Contractors (inspections of the Federal Tax Service, territorial branches of the Pension Fund of the Russian Federation, the Federal Compulsory Medical Insurance Fund, the Social Insurance Fund of the Russian Federation, etc.);
- The Ministry of Justice of the Russian Federation in Moscow, to which ANO "Center for Social and Psychological Assistance and Support for Women "Rare Women" submits an annual report on its activities;

No special consent from individuals is required for such transfer of Personal Data.

5.8. The operator takes the necessary legal, organizational, and technical measures to protect Personal Data from unauthorized or accidental access, destruction, alteration, blocking, distribution, and other unauthorized actions, including:

- Identifying threats to the security of Personal Data during its processing;
- Adopting local regulations and other documents governing relations in the field of Personal Data Processing and protection;
- Appointing persons responsible for ensuring the security of Personal Data in the Operator's structural units and information systems;
- Creating the necessary conditions for working with Personal Data;
- Organization of the accounting of documents containing Personal Data;
- Organization of work with information systems in which Personal Data is processed;
- Storing Personal Data in conditions that ensure its safety and prevent unauthorized access to it;
- Organization of training for the Operator's employees who process Personal Data.

5.9. The Operator stores Personal Data in a form that allows the subject of the Personal Data to be identified for no longer than is necessary for each purpose of Personal Data Processing, unless the storage period for Personal Data is established by federal law or contract.

5.9.1. Personal Data on paper media is stored at ANO "Center for Social and Psychological Assistance and Support for Women "Rare Women" for the duration of the storage of documents for which these periods are provided for by the legislation on archiving in the Russian Federation.

5.9.2. The storage period for Personal Data processed in Personal Data Information Systems corresponds to the storage period for Personal Data on paper.

5.10. The operator shall cease Personal Data Processing in the following cases:

- The fact of their unlawful processing has been identified. The deadline is within three working days from the date of identification;
- The purpose of their processing has been achieved;
- The term of validity has expired or the consent of the Personal Data Subject to the processing of the specified data has been withdrawn, when, according to the Personal Data Act, the processing of such data is permitted only with consent.

5.11. Upon achieving the purposes of Personal Data Processing, as well as in the event of withdrawal of consent to the Personal Data Processing by the data subject, the Operator shall cease processing such data if:

- Otherwise provided by a contract to which the Personal Data Subject is a party, beneficiary, or guarantor;

- The Operator is not entitled to process the data without the consent of the Personal Data Subject on the grounds provided for by the Personal Data Act or other federal laws;
- Unless otherwise provided for in another agreement between the Operator and the Personal Data Subject.

5.12. If the Personal Data Subject requests the Operator to stop Personal Data Processing within a period not exceeding 10 working days from the date of receipt of the relevant request by the Operator, the Personal Data Processing shall be stopped, except in cases provided for by the Personal Data Act. This period may be extended, but not by more than five working days. To do so, the Operator must send the Personal Data Subject a reasoned notification stating the reasons for the extension.

5.13. When collecting Personal Data, including through the Internet, the recording, systematization, accumulation, storage, clarification (updating, modification), and extraction of Personal Data of citizens of the Russian Federation using databases located outside the Russian Federation shall not be permitted, except in cases specified in the Personal Data Act.

6. Updating, Correcting, Deleting, Destroying Personal Data, Responding to Requests from Subjects for Access to Personal Data

6.1. Confirmation of the fact of Personal Data Processing by the Operator, the legal grounds and purposes of Personal Data Processing, as well as other information specified in Part 7 of Article 14 of the Personal Data Act, shall be provided by the Operator to the Personal Data Subject or his/her representative within 10 working days from the date of receipt of the request from the Personal Data Subject or his/her representative. This period may be extended, but not by more than five working days. To do so, the Operator must send the Personal Data Subject a reasoned notification indicating the reasons for extending the period for providing the requested information.

The information provided shall not include Personal Data relating to other Personal Data Subjects, except where there are legitimate grounds for disclosing such Personal Data.

The request must contain:

- The number of the main document proving the identity of the Personal Data Subject or their representative, info on the date of issue of the specified document and the issuing authority;
- Information confirming the participation of the Personal Data Subject in relations with the Operator (contract number, date of conclusion of the contract, conditional verbal designation and (or) other information), or information otherwise confirming the fact of Personal Data Processing by the Operator;
- The signature of the Personal Data Subject or their representative.

The request may be sent in the form of an electronic document and signed with an electronic signature in accordance with the legislation of the Russian Federation.

The Operator shall provide the information specified in Part 7 of Article 14 of the Personal Data Act to the Personal Data Subject or his representative in the form in which the relevant application or request was sent, unless otherwise specified in the application or request.

If the request (application) of the Personal Data Subject does not contain all the necessary information in accordance with the requirements of the Personal Data Act, or if the subject does not have the right to access the requested information, a reasoned refusal shall be sent to him.

The right of the Personal Data Subject to access their Personal Data may be restricted in accordance with Part 8 of Article 14 of the Personal Data Act, including if the Personal Data Subject's access to their Personal Data violates the rights and legitimate interests of third parties.

6.2. In the event of inaccurate Personal Data being identified when the Personal Data Subject or their representative makes a request, or at their request or at the request of Roskomnadzor, the Operator shall block the Personal Data relating to that Personal Data Subject from the moment of such a request or receipt of the specified request for the period of verification, if the Personal Data Blocking does not violate the rights and legitimate interests of the Personal Data Subject or third parties.

If the inaccuracy of Personal Data is confirmed, the Operator shall, on the basis of information provided by the Personal Data Subject or their representative, or Roskomnadzor, or other necessary documents, correct the Personal Data within seven working days from the date of submission of such information and unblock the Personal Data.

6.3. In the event of the discovery of unlawful Personal Data Processing upon request (inquiry) from the Personal Data Subject or their representative or Roskomnadzor, the Operator shall block the unlawfully processed Personal Data relating to that Personal Data Subject from the moment of such request or inquiry.

6.4. If the Operator, Roskomnadzor, or another interested party discovers the fact of unlawful or accidental transfer (provision, distribution) of Personal Data (access to Personal Data) that has resulted in a violation of the rights of Personal Data Subjects, the Operator shall:

- Within 24 hours, notify Roskomnadzor of the incident, the alleged causes that led to the violation of the rights of Personal Data Subjects, the alleged harm caused to the rights of Personal Data Subjects, and the measures taken to eliminate the consequences of the incident, as well as provide information about the person authorized by the Operator to interact with Roskomnadzor on issues related to the incident;
- Within 72 hours, notify Roskomnadzor of the results of the internal investigation of the identified incident and provide information about the persons whose actions caused it (if any).

6.5. Procedure for the Personal Data Destruction by the Operator.

6.5.1. Conditions and terms for the Personal Data Destruction by the Operator:

- Achievement of the purpose of Personal Data Processing or loss of the need to achieve this purpose - within 30 days;
- Achievement of the maximum storage periods for documents containing Personal Data - within 30 days;
- The data subject (or their representative) provides confirmation that the Personal Data has been obtained unlawfully or is not necessary for the stated purpose of processing - within seven working days;
- Withdrawal by the data subject of consent to the processing of their Personal Data, if their storage for the purpose of processing is no longer required - within 30 days.

6.5.2. Upon achievement of the purpose of Personal Data Processing, as well as in the event of withdrawal of consent to the Personal Data Processing by the data subject, Personal Data shall be destroyed if:

- Otherwise provided by a contract to which the Personal Data Subject is a party, beneficiary, or guarantor;
- The Operator is not entitled to process the data without the consent of the Personal Data Subject on the grounds provided for by the Personal Data Act or other federal laws;
- Unless otherwise provided for in another agreement between the Operator and the Personal Data Subject.

6.5.3. The Personal Data Destruction shall be carried out by a commission established by order of the President.

6.5.4. The methods of Personal Data Destruction are established in the Operator's local regulations.