

Privacy Policy

on the protection of personal data of clients in LLC Nevsky Beverage Plant

1. Terms and definitions

1.1. Personal data - any information relating to a specific or determined on the basis of such information to an individual (to the subject of personal data), including his last name, first name, patronymic, year, month, date and place of birth, address, e-mail address, phone number, other information.

1.2. Personal data processing - actions (operations) with personal data, including collection, systematization, accumulation, storage, clarification (update, change), use, transfer (distribution, provision), depersonalization, blocking.

1.3. Confidentiality of personal data is mandatory for compliance with the assigned responsible person who has access to personal data, the requirement to prevent their dissemination without the consent of the subject or other legal basis.

1.4. Dissemination of personal data - actions aimed at disclosing personal data an indefinite circle of persons;

1.5. Provision of personal data - actions aimed at disclosing personal data to a certain person or a certain circle of persons;

1.6. Use of personal data - actions (operations) with personal data performed in order to make decisions or perform other

actions that give rise to legal consequences in relation to subjects of personal data or otherwise affecting their rights and freedoms or the rights and freedoms of others.

1.7. Blocking of personal data - temporary cessation of collection, systematization, accumulation, use, distribution of personal data

data, including their transfer.

1.8. Destruction of personal data - actions as a result of which it is impossible to recover

the content of personal data in the personal data information system or as a result

which are destroyed material carriers of personal data.

1.9. Anonymization of personal data - actions, as a result of which it is impossible to determine without the use of additional information

the belonging of personal data to a specific subject.

1.10. Publicly available personal data -

personal data, access of an unlimited number of persons to which is provided with the consent of the subject or to which, in accordance with federal laws, the requirement of compliance does not apply

confidentiality.

1.11. Information - information (messages, data), regardless of the form of their presentation.

1.12. Client (subject of personal data) -

an individual or a representative of a legal

persons - a consumer of communication services provided by LLC Nevsky Beverage Plant.

1.13. Operator is a government agency

municipal authority, legal entity or individual, alone or jointly with other persons

organizing and (or) carrying out the processing of personal data, as well as determining the goals

processing of personal data, the composition of personal data to be processed, actions (operations) performed with personal data. Within the framework of these Regulations, the Operator is LLC "Nevsky Beverage Plant" - hereinafter referred to as the "Organization".

2. General provisions.

2.1. This Regulation on the protection of personal data of Subscribers (customers) at Nevsky Beverage Plant LLC (hereinafter - the Regulation) was developed in

in accordance with the Constitution of the Russian Federation, the Civil Code of the Russian Federation, Federal Law of 27.07.2006 No. 149-FZ "On Information, Information Technologies and Protection of Information", Federal Law of 27.07.2006 No. 152-FZ "On Personal Data", approved by other federal laws.

2.2. The purpose of the development of the Regulation is to determine

the procedure for the processing and protection of personal data of all Clients of the Organization, whose data is subject to processing, based on the operator's powers;

ensuring the protection of human rights and freedoms and a citizen in the processing of his personal data, including the protection of the rights to privacy, personal and family secrets, as well as

establishing the responsibility of officials,

having access to personal data, for failure to comply with the requirements of the rules governing the processing and protection of personal data.

2.3. This Regulation applies to the personal data of the Clients obtained in accordance with the requirements of the legislation within the framework of contracts for the provision of communication services.

2.4. The procedure for putting into effect and changing the Regulation.

2.4.1. This Regulation comes into force from the moment of its approval by the Director General Organization and is valid indefinitely, until it is replaced by a new Regulation.

2.4.2. Changes to the Regulations are made on the basis of the Orders of the Director General of the Organization.

2.5. This Regulation is binding on all employees who have access to the personal data of the Clients.

3. Composition of personal data.

3.1. The personal data of Clients, including including:

3.1.1. Full Name.

3.1.2. Date and place of birth

3.1.3. Passport data

3.1.4. E-mail address.

3.1.5. Phone number (home, mobile).

3.1.6. Registration address.

3.1.7. Residence address.

3.2. The Organization can create (create, collect) and store the following documents and

information, including in electronic form, containing data about Clients:

3.2.1. Application for a survey on the possibility of connecting an individual.

3.2.2. Agreement (public offer).

3.2.3. Copies of identity documents, as well as other documents provided by the Client and containing personal data.

3.2.4. Data on payments for goods / services, containing payment and other details of the Client.

4. Purpose of processing personal data.

4.1. The purpose of personal data processing is implementation of a set of actions aimed at achieving the goal, including:

4.1.1. Provision of communication services in accordance with the concluded agreement.

4.1.2. Subscriber service.

4.1.2. Other actions aimed at improving the quality of the provision of services, not prohibited legislation, as well as a set of actions with personal data required to perform the above actions.

4.1.3. In order to comply with the requirements of the legislation of the Russian Federation.

4.2. The condition for the termination of the processing of personal data is the liquidation of the Organization, as well as the termination of the contract with the Client.

5. Collection, processing and protection of personal data

5.1.1. The receipt (collection) of the client's personal data is carried out at the time of filing an application for the conclusion of the contract.

5.1.2. In the absence of technical capability to provide communication services and conclude an agreement, the received personal data are subject to destruction.

5.1.3. In case of signing a service agreement, the Client expresses his consent to the processing of personal data required by the Organization to fulfill its obligations under the contract. Client -

a legal entity guarantees obtaining the consent of its employees to the processing of personal data.

5.1.4. The consent of the subject to the processing of personal data is valid for the entire duration of the contract, as well as during the storage period of contracts and agreements, - 3 years from the date of termination of the contract for the provision of services for the supply of goods and the provision of services.

5.1.5. The organization has no right to receive and process the personal data of the Client about his race, nationality, political views, religious or philosophical beliefs, health status, intimate life.

5.2. The procedure for processing personal data:

5.2.1. The subject of personal data provides the Organization with reliable information about himself.

5.2.2. Only employees of the Organization who are allowed to work with the personal data of the Client can have access to the processing of the personal data of the Clients.

5.2.3. The processing of the Client's personal data can be carried out exclusively for the purposes of provision of communication services and in accordance with

requirements of laws and other regulatory legal acts of the Russian Federation in the field of communications.

5.2.5. When determining the volume and content, processed personal data The Organization is guided by the Constitution of the Russian

Federation, the law on personal data, legislation in the field of communications, and other federal laws.

5.3. Protection of personal information:

5.3.1. Protected by the personal data of the Client

a set of measures is understood (organizational administrative, technical, legal),

aimed at preventing unauthorized or accidental access to them, destruction, modification, blocking, copying, distribution

personal data of subjects, as well as from other illegal actions.

5.3.2. Protection of personal data of the Client

carried out at the expense of the Organization in the manner established by the federal law of the Russian Federation, local organizational and administrative documents.

5.3.3. The organization, when protecting the personal data of Clients, takes all the necessary organizational, administrative, legal and technical measures, including:

- Antivirus protection.
- Security analysis (performance assessment)
- Intrusion detection and prevention (detection of facts of unauthorized access to personal data and taking action)
- Access control.
- Registration and accounting.
- Ensuring integrity.
- Issuance of local acts regulating the protection of personal data.

5.3.4. The general organization of the protection of personal data of Clients is carried out by the person responsible for organizing the processing of personal data Organizations.

5.3.5. Employees of the Organization have access to the personal data of the Client, who need personal data in connection with their performance job responsibilities.

5.3.6. All employees associated with receiving, processing and protection of personal data of Clients, are obliged to sign a Non-Disclosure Agreement personal data of Clients.

5.3.7. The procedure for obtaining access to the personal data of the Client includes:

- Familiarization of the employee against signature with this Regulation. In the presence of other normative acts (orders, orders, instructions, etc.), regulating the processing and protection of the Client's personal data, with these acts also familiarization with signature is made.

- Request from the employee of a written obligations to maintain the confidentiality of personal data of Clients.

5.3.8. An employee of the Organization who has access to personal data of Clients in connection with the performance of job duties:

- Provides storage of information containing personal data of the Client, excluding access to them by third parties.
- In the absence of an employee at his workplace there should be no documents containing personal data of Clients

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- When going on vacation, during work business trips and in other cases of long absence of an employee at his workplace, he is obliged to transfer documents and other media, containing personal data of Clients to a person to whom a local act of the Company (order, order) will be entrusted with the execution of his job duties.

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- If such a person is not appointed, then documents and other media containing the personal data of the Clients are transferred to another employee who has access to the personal data of the Clients at the direction of the General Director of the Organization.

- Upon dismissal of an employee who has access to personal data of Clients, documents and other media containing personal data

Clients are transferred to another employee who has access to the personal data of Clients at the direction of the General Director.

- In order to complete the assigned task and on the basis of a memo with a positive resolution of the General Director, access to the personal data of the Client may be provided to another employee.

Admission to

the personal data of the Client of other employees of the Organization who do not have properly formalized access is prohibited.

5.3.9. The person entrusted with personnel records in the Organization provides:

- Familiarization of employees against signature with these Regulations.
- Requesting written documents from employees confidentiality obligations

personal data of the Client (Agreement on non-disclosure) and compliance with the rules for their processing.

- General control over compliance by employees with measures to protect the personal data of the Client.

5.3.10. Protection of personal data of Clients, stored in the electronic databases of the Organization, from unauthorized access, distortion and destruction of information, as well as from other illegal actions, is provided by employees of the Organization's division.

5.4. Storage of personal data:

5.4.1. The personal data of the Clients in hard copy are stored in the offices of the employees who have access to the personal data of the Clients in specially designated places.

5.4.2. Personal data of Clients in electronic form are stored in the local computer network

Organizations, in electronic folders and files in personal computers of employees admitted to the processing of personal data of Clients, in Information systems and electronic databases of the Organization.

5.4.3. Защита доступа к электронным базам данных, содержащим персональные данные Клиентов, обеспечивается:

- Differentiation of access rights using an account.
- Two-step password system: at the level

local computer network and at the database level.

Passwords are set by employees of the organizational unit and communicated individually employees who have access to the personal data of the Clients.

5.4.4. Unauthorized access to PCs containing personal data of Clients is blocked by a password, which is set by employees of the Organization's division and is not subject to disclosure.

5.4.5. Responding to written requests from others organizations and institutions about the personal data of Clients are given only with the written consent of the Client himself, unless otherwise established legislation. Answers are made in in writing, on the letterhead of the Organization, and to the extent that allows not to disclose an excessive amount of personal data of the Client.

6. Blocking, depersonalization, destruction of personal data

6.1. The procedure for blocking and unblocking personal data:

6.1.1. Blocking of personal data of Clients is carried out with a written application from the Client.

6.1.2. Blocking personal data means:

6.1.2.1. Prohibition of editing personal data.

6.1.2.2. Prohibition of the dissemination of personal data by any means (e-mail, cellular communication, material carriers).

6.1.2.3. Removal of paper documents related to the Client and containing his personal data from the internal document flow of the Organization and the prohibition of their use.

6.1.3. The blocking of the Client's personal data can be temporarily removed if it is required to comply with the legislation of the Russian Federation.

6.1.4. The unblocking of the Client's personal data is carried out with his written consent (if there is a need to obtain consent) or the Client's application.

6.1.5. The Client's repeated consent to the processing of his personal data (if necessary, his receiving) entails the unblocking of his personal data.

6.2. The procedure for anonymization and destruction of personal data:

6.2.1. The procedure for anonymization of personal data is carried out in accordance with the requirements of the Order of the Federal Service for Supervision in the Sphere of Communications, Information Technology and Mass communications dated 05.09.2013 No. 996 "On approval of requirements and methods for depersonalization personal data".

6.2.2. Personal data on paper are subject to destruction.

6.2.3. When testing the information systems of the Organization, the personal data of customers are subject to anonymization.

6.2.5. The organization must ensure confidentiality in relation to personal data, if necessary, to test information systems on the developer's territory and depersonalize personal data in information transmitted to the developer systems.

6.2.6. Destruction of the Client's personal data implies the termination of any access to the Client's personal data.

6.2.7. When the personal data of the Client is destroyed, the employees of the Organization cannot get access to the personal data of the subject in information systems.

6.2.8. Paper carriers of documents when destruction of personal data is destroyed, personal data in information systems are depersonalized.

6.2.9. The operation of destruction of personal data is irreversible.

6.2.10. The period after which the operation of destruction of the Client's personal data is possible, is determined by the end of the period specified in paragraph

7.3 of these Regulations.

7. Transfer and storage of personal data

7.1. Transfer of personal data:

7.1.1. The transfer of personal data of a subject is understood as the dissemination of information through communication channels and on material media.

7.1.2. When transferring personal data, employees of the Organization must comply with the following

Requirements:

7.1.2.1. Do not provide personal data of the Client for commercial purposes.

7.1.2.2. Do not disclose the personal data of the Client to a third party without written consent

The Client, with the exception of cases established by federal law of the Russian Federation.

7.1.2.3. Allow access to personal data of Clients only to specially authorized persons, while these persons should have the right

receive only those personal data of Clients,

which are necessary to perform specific functions.

7.1.2.4. Transfer personal data of the Client within the Organization in accordance with this Regulation, regulatory and technological documentation and job descriptions.

7.1.2.5. Provide the Client with access to their personal data when contacting or upon receiving a Client's request. The organization is obliged to inform the Client about the availability

personal data about him, as well as provide an opportunity to get acquainted with them within ten working days from the date of contact.

7.1.2.7. Transfer personal data of the Client representatives of the Client in the manner prescribed by law and regulatory and technological documentation and limit this information only to those personal data of the subject that

are necessary for these representatives to perform their functions.

7.2. Storage and use of personal data:

7.2.1. The storage of personal data is understood as the existence of records in information systems and on tangible media.

7.2.2. Personal data of Clients are processed and stored in information systems, as well as on paper in the Organization. Personal data of Clients is also stored in electronic form: in the local computer network of the Organization, in electronic folders and files, information systems.

7.2.3. The storage of the Client's personal data can be carried out no longer than required by the purpose

processing, unless otherwise provided by federal laws of the Russian Federation.

7.3. Storage periods for personal data:

7.3.1. The storage period for civil contracts containing personal data of Clients is 5 years from the date of termination of the contractual relationship between the Client and the Organization.

7.3.2. During the storage period, personal data cannot be anonymized or destroyed.

7.3.3. After the expiration of the storage period, personal data must be depersonalized in information systems and destroyed on paper in

the procedure established in the Regulations and the current legislation of the Russian Federation.

8. Rights of the operator of personal data

The organization has the right to:

8.1. Defend your interests in court.

8.2. Provide personal data of Clients to third parties, if this is provided for by applicable law (tax, law enforcement agencies, etc.).

8.3. Refuse to provide personal data in cases provided by law.

8.4. Use the personal data of the Client without his consent only in cases provided for

the legislation of the Russian Federation.

9. Права Клиента

The client has the right:

9.1. Require clarification of your personal data, their blocking or destruction if personal data is incomplete,

obsolete, unreliable, illegal
received or not necessary for
the stated purpose of the processing, as well as to accept
measures provided by law to protect their rights;

9.2. Require a list of processed
personal data available in the Organization and the source
of their receipt.

9.3. Receive information about the timing of personal data
processing, including the timing of their storage.

9.4. To appeal to the authorized body for the protection of
the rights of subjects of personal data or in a judicial
proceeding against illegal actions or omissions in the
processing of his personal data.

10. Responsibility for violation of the rules governing the
processing and protection of personal data

10.1. Employees of the Organization guilty of violating the
rules governing the receipt, processing and protection of
personal data are disciplined,

administrative, civil or criminal liability in accordance with
the current legislation of the Russian Federation and
internal local acts of the Organization.

Appendix No. 1 to the
Regulation on
Protection

personal data of
clients

List of positions of
employees who have
access to personal
data of clients of the
Organization

1. General Director
2. Deputy directors
3. Heads of
departments (
structural divisions)
4. Specialists (
managers)
5. Programmers
6. Lawyer
7. Accountants

Appendix No. 2 to the
Regulation on
Protection

personal data of
clients

Obligation to comply with the regime
confidentiality of personal data of clients I,

_____,
working in LLC "Nevsky Beverage Plant" "in the
position of _____,

I undertake:

1. Not to disclose, not to publicly disclose, as well as to comply with the provisions of the Protection Regulation personal data of clients of LLC "Nevsky Beverage Plant" the procedure for transferring to third parties information constituting personal data of clients, who will be entrusted to me or become known in connection with the performance of labor duties.

Comply with the requirements of the Regulation on the protection of personal data of clients, orders, orders, instructions and other local regulations to ensure

confidentiality of personal data of clients and compliance with the rules for their processing.

2. In the event of an attempt by unauthorized persons to obtain from me information constituting personal data client, immediately inform the director of the Institution.

3. In the event of my dismissal, all media containing personal data of clients (documents, copies of documents, floppy disks, disks, magnetic tapes, printouts on printers, drafts, film and photo negatives, positives, etc.), which were at my disposal in connection with my work duties during

work to transfer to the director of the Institution or another employee at the direction of the director of the Institution.

4. About the loss or lack of documents or other media containing personal data

clients (certificates, passes, etc.); keys from vaults, safes (metal cabinets) and other facts that may lead to the disclosure of personal data of clients, as well as the reasons and conditions for a possible leak of information, immediately inform the General Director of the Organization or his deputies.

I am familiarized with _____ against signature:

with the Regulation on the protection of personal data of clients of LLC "Nevsky Beverage Plant"

I am aware that my violation of my obligations to protect personal data of clients may result in disciplinary, civil, criminal and other liability in accordance with the legislation of the Russian Federation.

" _____ " _____ 20 _____ г. _____ /
_____ /