 ВНУКОВО Международный аэропорт	Personal Data Processing Policy at Vnukovo International Airport, JSC	П-09.05-01
		Issue 2, Revision 0 Page 1 of 9

VNUKOVO INTERNATIONAL AIRPORT, JOINT-STOCK COMPANY


APPROVED BY

Order № 01-04/368-24 of Vnukovo International Airport, JSC
dated 13.11.2024

Personal Data Processing Policy
at Vnukovo International Airport, JSC

MOSCOW-2024

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	Personal Data Processing Policy at Vnukovo International Airport, JSC	П-09.05-01
		Issue 2, Revision 0 Page 2 of 9

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Table of Contents

1	Introduction	4
2	Scope of Application	4
3	Terms and Definitions	4
4	Principles and Purposes of Personal Data Processing	5
5	Legal Grounds for Processing Personal Data	5
6	List of Subjects Whose Personal Data are Processed in the Organization.....	7
7	List of Personal Data Processed in the Organization	7

1 Introduction

П-09.05-01 "Personal Data Processing Policy at Vnukovo International Airport, JSC" (hereinafter, the "Policy") is developed in accordance with Paragraph 2 Part 1 Article 18.1 of Federal Law No. 152-ФЗ of the Russian Federation On Personal Data dated 27.07.2006 and defines the basic principles, purposes, conditions, and methods of personal data processing, lists of personal data subjects and personal data processed by Vnukovo International Airport, JSC (hereinafter referred to as the "Organization"), functions of the Organization in personal data processing, rights of personal data subjects as well as the personal data protection requirements implemented in the Organization.

2 Scope of Application

The provisions of the Policy serve as the grounds for the development of local regulations governing the processing of personal data of the Organization employees and other personal data subjects in the Organization.

The Policy serves as the basis for the Organization to develop local regulations that determine the personal data processing policy.

The Policy has been developed to implement the provisions of the legislation of the Russian Federation regarding personal data processing as well as the requirements of regulatory and methodological documents on personal data protection.

3 Terms and Definitions

For the purposes of the Policy, the following terms and abbreviations are used:

Automated Processing of Personal Data shall mean computer-assisted personal data processing;

Personal Data Blocking shall mean a temporary termination of personal data processing (except in cases where processing is necessary to clarify personal data);

Access to Personal Data shall mean the ability to obtain personal data and their use;

Personal Data Information System shall mean aggregation of personal data contained in the personal data databases and the IT technologies and technical means ensuring personal data processing;

Information shall mean information (messages, data) regardless of the form of presentation;

Personal Data Anonymization shall mean actions resulting in the impossibility of attributing personal data to a specific personal data subject without additional information;

Personal Data Processing shall mean any action (operation) or a set of actions (operations) performed with or without the use of automation tools with personal data, including collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, transfer (dissemination, provision, access), anonymization, blocking, deletion, destruction of personal data;

Publicly Available Personal Data shall mean personal data, in particular, name, patronymic, surname, employer, position held, corporate telephone number, e-mail address—to be included in public sources of personal data (directories) with the written consent of the personal data subject;

Operator shall mean a state authority, municipal authority, legal entity, or individual, independently or jointly with other persons arranging and/or carrying out personal data processing as well as determining the purposes of personal data processing, the composition of personal data to be processed, actions (operations) performed with personal data;

Personal Data shall mean any information related to an individual who is identified or identifiable, directly or indirectly (personal data subject);

Provision of Personal Data shall mean actions aimed at disclosure of personal data to a certain person or a certain circle of persons;

Disclosure of Personal Data shall mean actions that allow for familiarizing with personal data processed in the Organization;

Dissemination of Personal Data shall mean actions aimed at disclosure of personal data to an indefinite circle of persons;

Destruction of Personal Data shall mean actions as a result of which it becomes impossible to restore the content of personal data in the personal data information system and/or as a result of which the tangible media with personal data are destroyed.

4 Principles and Purposes of Personal Data Processing

As the operator of personal data, the Organization processes the personal data of the Organization employees and other personal data subjects that are not in labor relations with the Organization.

Personal data in the Organization is processed subject to the necessity of ensuring the protection of the rights and freedoms of the Organization employees and other personal data subjects, including the protection of the right to personal and family privacy, based on the following principles:

- Personal data shall be processed in the Organization on a legal and equitable basis;
- Personal data processing shall be limited to the achievement of specific, predetermined, and legitimate purposes;
- No personal data processing incompatible with the purposes of collecting personal data shall be allowed;
- Combining databases containing personal data that may be processed for purposes incompatible between them shall be forbidden;
- Only personal data that meet the purposes of processing shall be processed;
- The content and volume of the processed personal data shall correspond to the stated purposes of the processing. Redundancy of the processed personal data as compared to the stated purposes of their processing shall not be allowed;
- When processing personal data, the accuracy of personal data, their sufficiency, and if required, relevance as compared to the purposes of personal data processing shall be ensured. The Organization shall take the required measures to delete or clarify incomplete or inaccurate personal data;
- Personal data shall be kept in a form that allows identifying a personal data subject for no longer than allowed in accordance with personal data processing purposes unless the storage period for personal data is established by federal law or an agreement whereto a personal data subject is a party, beneficiary, or guarantor;
- The processed personal data shall be destroyed or anonymized upon achievement of the processing goals or in case of loss of the need to achieve these goals unless otherwise provided for by federal law.

Personal data is processed by the Organization for the purpose of:


- Providing one-time access to the Organization's territory;
- Making decisions on employment;
- Making decisions on election to the Board of Directors of the Organization;
- Ensuring compliance with laws and other regulations, assistance to employees in employment, training, and promotion, ensuring the personal safety of employees, monitoring the quantity and quality of work performed, and ensuring the safety of property;
- Ensuring compliance with laws and other regulations;
- Making decisions on the contract conclusion, concluding the contracts, and fulfilling the obligations thereunder;
- Booking of hotel rooms, arranging reception and accommodation of guests;
- Providing telecommunications services;
- Providing training services;
- Conducting investigations on the requests of customers of the Organization.

5 Legal Grounds for Processing Personal Data

The grounds for the Organization to process the subjects' personal data are as follows:

- Federal Law No. 51-Ф3 of the Russian Federation Civil Code of the Russian Federation (Part One) dated

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	Personal Data Processing Policy at Vnukovo International Airport, JSC	П-09.05-01
		Issue 2, Revision 0 Page 6 of 9

November 30, 1994;

- Federal Law No. 14-ФЗ of the Russian Federation Civil Code of the Russian Federation (Part Two) dated January 26, 1996;
- Federal Law No. 146-ФЗ of the Russian Federation Tax Code of the Russian Federation dated July 31, 1998;
- Federal Law No. 197-ФЗ of the Russian Federation Labor Code of the Russian Federation dated December 30, 2001;
- Federal Law No. 149-ФЗ of the Russian Federation On Information, Information Technology and Information Protection dated July 27, 2006;
- Federal Law No. 152-ФЗ of the Russian Federation On Personal Data dated July 27, 2006;
- Federal Law No. 115-ФЗ On Countermeasures to Combat Legalization (Laundering) of Illegally Obtained Proceeds and Financing of Terrorism dated August 7, 2001;
- Federal Law No. 173-ФЗ On Currency Regulation and Currency Control dated December 10, 2003;
- Federal Law No. 27-ФЗ On Individual (Personified) Accounting in the Systems of Compulsory Pension Insurance and Compulsory Social Insurance dated April 1, 1996;
- Federal Law No. 167-ФЗ On Compulsory Pension Insurance in the Russian Federation dated December 15, 2001;
- Federal Law No. 173-ФЗ On Labor Pensions in the Russian Federation dated December 17, 2001;
- Federal Law No. 402-ФЗ On Accounting dated December 6, 2011;
- Federal Law No. 223-ФЗ On Procurement of Goods, Works, and Services by Certain Types of Legal Entities dated July 18, 2011;
- Federal Law No. 16-ФЗ On Transport Safety dated February 9, 2007;
- Federal Law No. 273-ФЗ On Education in the Russian Federation dated December 29, 2012;
- Federal Law No. 109-ФЗ On Migration Registration of Foreign Citizens and Stateless Persons in the Russian Federation dated July 18, 2006;
- Federal Law No. 126-ФЗ On Communications dated July 7, 2003;
- Resolution No. 687 of the Government of the Russian Federation On Approval of the Regulation on the Specifics of Personal Data Processing Performed Without the Use of Automation Tools dated September 15, 2008;
- Resolution No. 1119 of the Government of the Russian Federation On Approval of Requirements for Personal Data Protection when Processing Them in Personal Data Information Systems dated November 1, 2012;
- Resolution No. 512 of the Government of the Russian Federation On Approval of Requirements for Material Media of Biometric Personal Data and Technologies for Storing such Data Outside Personal Data Information Systems dated July 6, 2008;
- Resolution No. 886 of the Government of the Russian Federation On Approval of Requirements for Ensuring Transport Security, Including Requirements for Anti-Terrorist Security of Facilities (Territories) Taking into Account the Levels of Security for Various Categories of Air Transport Infrastructure Facilities and Transport Vehicles dated July 28, 2018;
- Resolution No. 609 of the Government of the Russian Federation On Approval of the Rules for Investigation of Aircraft Accidents and Incidents with Civil Aircraft in the Russian Federation dated June 18, 1998;
- Resolution No. 9 of the Government of the Russian Federation On the Procedure for Migration Registration of Foreign Citizens and Stateless Persons in the Russian Federation dated January 15, 2007;
- Order No. 325 of the Ministry of Transport of the Russian Federation On Approval of Documents Related to the Certification of Transport Security Forces and Personal Data Processing of Certain Categories of Persons Employed Directly Related to Ensuring Transport Security or Performing Such Work, the Certification of Which is Preceded by Personal Data Processing dated November 3, 2015;
- Articles of Association of the Organization.

The Organization processes personal data whereof the Organization has become aware of in connection with the implementation of the statutory objectives and goals of the Organization, and as a result, inter alia, of:

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- The conclusion of civil law contracts;
- The conclusion of service contracts;
- The conclusion of cooperation agreements;
- The execution and/or receipt of powers of attorney (including on behalf of the Organization);
- The receipt of any other documents from the Organization's customers or counterparties, required for the Organization to conclude contracts with such persons;
- The receipt of written requests, inquiries, applications, complaints, and petitions, including electronic ones, by the Organization;
- The e-mail correspondence;
- The receipt of documents of visitors by the Organization when they visit the premises of the Organization;
- Other actions provided for by the current legislation of the Russian Federation or internal policies of the Organization.

6 List of Subjects Whose Personal Data are Processed in the Organization

The Organization represented by the general director, or the head of the Organization authorized by the order, when processing personal data of:

- Visitors;
- Applicants for a vacancy;
- Applicants to the Board of Directors;
- Employees;
- Employee's relatives;
- Counterparties;
- Counterparty representatives;
- Customers.

7 List of Personal Data Processed in the Organization

In accordance with Resolution No. 1119 of the Government of the Russian Federation On Approval of Requirements for Personal Data Protection when Processing Them in Personal Data Information Systems dated November 1, 2012, the following categories of personal data are processed in the Organization:

- Other categories of personal data: personal data not classified as special, biometric, and publicly available personal data;
- Special categories of personal data: personal data relating to race, nationality, political views, religious or philosophical beliefs, health status, intimate life;
- Biometric categories of personal data: personal data characterizing physiological and biological features of a person that can be used as a basis for establishing their identity and which are used by the Organization to establish the identity of the personal data subject.

The Organization processes the following categories of personal data without the use of automation tools:

- Other categories of personal data: personal data not classified as special, biometric, and publicly available personal data;
- Special categories of personal data: personal data relating to race, nationality, political views, religious or philosophical beliefs, health status, intimate life.

The Organization processes cookie data for statistical analysis of using services and ensuring their performance in general as well as their individual functions.

A complete list of personal data and categories of personal data subjects is given in the Organization's Standard "Personal Data Processing at Vnukovo International Airport, JSC."

