

politics
regarding the processing of personal data of a Limited
Liability Company
GEROPHARM

1. General provisions

1.1 This Personal Data Processing Policy (hereinafter referred to as the Policy) has been developed in accordance with the requirements of the Federal Law of the Russian Federation "On Personal Data" No. 152-FZ of 27.07.2006.

1.2 The purpose of this Policy is to determine the approaches of GEROPHARM LLC, location address-197046, St. Petersburg, Chapaeva str., 15, building 2B, 9th floor, TIN: 7826043970, hereinafter-the Company, to the processing and protection of personal data.

1.3 The Company adheres to the principles of ensuring the security of personal data of personal data subjects in order to protect their rights and freedoms, including the protection of the rights to privacy, personal and family secrets, as well as compliance with the requirements of Russian and international legislation.

1.4 This Policy applies to all information containing personal data of personal data subjects that the Company or related persons may receive about the personal data subject in the course of their main business.

1.5 This Policy is publicly available.

2. The concept of personal data

2.1 Personal data refers to any information that relates directly or indirectly to a specific or identifiable individual (subject of personal data).

2.2 Processing of personal data means 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 (distribution, provision, access), depersonalization, blocking, deletion, or destruction of personal data.

3. Subjects and purposes of personal data processing

3.1 Categories of personal data subjects:

3.1.1. Job seekers (persons who have not entered into an employment contract with the Company, but are negotiating for the purpose of entering into such a contract). Composition of personal data of the Company's applicants:

- Last name, first name, patronymic;
- Year, month, and date of birth;
- Data of the identity document;
- Citizenship;
- Gender;
- Email address;
- Phone number;
- Information about your education.

- Information about employment (including length of service, current employment at the current time, including the name and current account of the organization).

3.1.2. Employees of the Company (persons who are or have been in an employment relationship with the Company), as well as relatives of employees. Composition of personal data of the Company's employee:

Surname, first name, patronymic; year of birth; place of birth; marital status; income; gender; address of residence; registration address; SNILS; TIN; citizenship; data of the identity document; data of the driver's license; data of the identity document outside the Russian Federation;

bank card details; profession; information about employment (including work experience, current employment data with the name and current account of the organization); attitude to military service, information about military registration; photo and video image of a person; information about education; knowledge of a foreign language; family composition (degree of kinship, surname, first name, patronymic, year of birth); service number; information about the tariff rate (salary), allowances; information about advanced training (start/end date of training, type of advanced training, name of the educational institution, its location, name, series, number, date of the document (certificate, certificate), certificate), basis); information about professional retraining (start/end date of retraining, specialty (direction, profession), name, number, date of document (diploma, certificate), basis); information about awards (incentives), honorary titles (name of the award (incentives), name, number, date document); information about social benefits to which the employee is entitled in accordance with the legislation (name of the benefit, number, date of issue of the document, basis); information about the health insurance policy; Information about changing the full name

3.1.3. Contractors (individuals or their representatives (persons acting under a power of attorney of an individual, etc.) who provide services to the Company on the basis of civil law agreements (including individual entrepreneurs), as well as managers, representatives and employees of a legal entity that has contractual relations with the Company or is at the stage of pre-contractual relations with the Company. This category also includes partners and representatives of the Company's partners). Composition of the counterparty's personal data:

- Last name, first name, patronymic;
- Passport data (series, number, issued by whom, date of issue);
- Contact phone number.
- Email address.
- Place of work;
- Current position;
- Details of the power of attorney (number, date of issue);

- Information about the individual taxpayer number (TIN) – for contractors Who are individual entrepreneurs.
- Signature.

3.1.4. Site users. Composition of the user's personal data:

- IP address.
- Data from cookies.
- Information about the geographical location.
- Addresses of the requested pages and search queries.
- Information about the device, technical characteristics of the hardware and software used.
- other personal data provided by users of the site that is necessary for the conclusion and execution of contracts.

3.1.5. Users of the Company:

- Last name, first name, patronymic;
- Passport data;
- Information about the vehicle.

3.2 Purposes of personal data processing:

- conclusion of an employment contract and fulfillment of obligations arising in connection with it;
- conclusion of a civil contract and fulfillment of obligations arising in connection with it;
- conclusion of a contract with the counterparty and fulfillment of obligations arising in connection with it;
- provision of information and intermediary services for the conclusion and execution of a contract between the client and the counterparty;
- establish feedback with the subjects of personal data, including to confirm the accuracy and completeness of the personal data provided by them when contacting the Company;
- customer support at the request of the subject and to improve the quality of service;
- conducting statistical and other research, including with the aim of improving the site's performance;
- organization of access control, ensuring the physical security of employees and visitors located on the territory of the Company's office premises, ensuring the safety of the Company's property and employees.

3.3 The Company processes the data collected using cookies only for statistical purposes, for diagnostics of difficulties with the server and for administration of the Company's website. The User can disable the ability to transmit the use of cookies by the Operator in the browser settings.

4. Principles of personal data processing

4.1 The Company processes personal data in accordance with the principles defined by the legislation of the Russian Federation.

4.2 Обработка персональных данных осуществляется The Company may process personal data with or without the use of automation tools.

4.3 Processing of personal data that is incompatible with the purposes of personal data collection is not allowed.

4.4 It is not allowed to process personal data that is redundant in relation to the stated purposes of their processing.

4.5 Personal data processed by the Company is destroyed after the purposes of their processing are achieved, unless otherwise provided for by the requirements of the legislation of the Russian Federation.

5. Terms of personal data processing

5.1 Processing of personal data in the Company is permitted if at least one of the following conditions is met:

- with the consent of the personal data subject;
- processing is necessary for achieving the goals stipulated by law, for performing the functions, powers and duties assigned to the Company by the legislation of the Russian Federation;
- processing is necessary for the performance or conclusion of a contract to which the personal data subject is a party;
- personal data is made publicly available by the personal data subject;
- if there are other conditions that allow, in accordance with the legislation of the Russian Federation, the processing of personal data.

5.2 The Company has the right to entrust the processing of personal data to third parties solely for the purpose of exercising its rights and obligations with respect to the subject of personal data, as well as compliance with the legislation of the Russian Federation. The order may be executed only if the conditions established by the legislation of the Russian Federation are met, as well as the signing of the contract of the order for processing personal data or the obligation to ensure the confidentiality and security of the information received.

5.3 When entrusting the processing of personal data to third parties, the Company is responsible for the actions of such persons.

5.4 Personal data is transferred to third parties to the extent and for the period required for the purposes of its processing.

5.5 Storage and processing of personal data in the Company is carried out within the time limits corresponding to the purposes of personal data processing.

6. Ensuring the protection of personal data

6.1 The Company takes the necessary legal, organizational and technical measures to ensure the protection of personal data from accidental or intentional access, destruction, modification, blocking and other unauthorized actions.

6.2 Employees of the Company who are authorized to process personal data sign an obligation not to disclose personal data that became known to them while performing their official duties.

6.3 Requirements for personal data protection measures and ways to implement these requirements are implemented in accordance with the guidelines and methodological documents of the FSTEC of Russia and the Federal Security Service of Russia.

6.4 The Company defines the persons responsible for organizing the processing and protection of personal data.

6.5 The processed personal data is stored on servers located on the territory of the Russian Federation in full compliance with the legal and regulatory requirements established by the current legislation of the Russian Federation.

7. Rights of the personal data subject

7.1 The personal data subject has the right to receive the following information from the Company:

- confirmation of the processing of personal data;
- legal grounds and purposes of personal data processing;
- the purposes and methods used for processing personal data;
- name and location of the Company, information about persons (except for full-time employees of the Company) who have access to their personal data or to whom personal data may be disclosed;
- specific types of personal data processed, the source of their receipt;
- terms of processing, including the terms of storing personal data;
- information about cross-border data transfers that have been made or are being considered;
- name or surname, first name, patronymic and address of the person who processes personal data on behalf of the Company, if the processing is or will be entrusted to such a person;
- other information required by the legislation of the Russian Federation.

7.2 The personal data subject has the right to:

- require the Company to clarify its personal data, block or destroy them (if the personal data is incomplete, outdated, unreliable, illegally obtained or not necessary for the stated purpose of processing);
- require the Company to ensure clarification, blocking or destruction of personal data if the processing of personal data is carried out by third parties on behalf of the Company.

7.3 The personal data subject has the right to withdraw his / her consent to the processing of his / her personal data by sending a written notification to the Company about the withdrawal of consent to the processing of his / her personal data. In such a case, the Company stops processing the personal data of the personal data subject and destroys the personal data within a period not exceeding thirty days from the date of receipt of the above-mentioned revocation, with the exception of those data that are required to be stored for the purposes of personal data processing provided for by the legislation of the Russian Federation.

7.4 The personal data subject may at any time change (update, supplement) the personal data provided to them or part of it by sending a request to the Company.

7.5 If a personal data subject considers that the Company processes his / her personal data in violation of the requirements of the Russian Federation legislation in the field of personal data or otherwise violates his / her rights and freedoms, then he / she has the right to appeal against the Company's actions or omissions by applying to the authorized body for the protection of the rights of personal data subjects, or in court.

7.6 The subject of personal data has the right to protect their rights and legitimate interests, including compensation for losses and (or) compensation for moral damage in court.

8. Final provisions

8.1 The Policy is subject to review on an annual basis, as well as in the event of changes in the current legislation on personal data regarding the processing of personal data in the Company.

8.2 For questions concerning the application of this Policy and the processes of personal data processing in the Company, interested persons can contact the following address: 197046, St. Petersburg, Chapaeva str., 15, building 2B, 9th floor, e-mail: inform@geropharm.com.