

POLICY
OF THE CLOSELY HELD COMPANY "MEDICAL AND PREVENTIVE TREATMENT
FACILITY OF THE NATURAL HEALTH IMPROVEMENT KLINIKA KIVACH"
REGARDING THE PROCESSING OF PERSONAL DATA

1. General provisions.

1.1 The present document defines the policy of the closely held company "Medical and preventive treatment facility of the natural health improvement Klinika Kivach"(hereinafter ZAO Klinika Kivach, the Clinic) regarding the processing of personal data (hereinafter - Policy).

ZAO Klinika Kivach, being the Operator performing the processing of personal data, provides protection of the rights and freedoms of subjects while processing their personal data and takes measures to ensure the performance of duties provided by the Federal Law dated 27 July 2006 No. 152-FZ "On Personal Data" and regulatory legal acts adopted in conformance with it.

1.2 The provisions of the Policy apply to the relations on processing and protection of personal data received by the Clinic both before and after the approval of the Policy, except for cases when, for legal, organizational and other reasons, the provisions of the Policy cannot be extended to the relations on the processing and protection of personal data received before its approval.

2. General definitions used in the Policy.

2.1 The clinic – medical organization “ZAO Klinika Kivach” (OGRN 1101039000260, INN 1003001854), provides paid medical services to consumers in accordance with the license for medical activities No. JIO-10-01-001090 dated 15.12.2016.

2.2 Paid medical services - medical services provided on a paid basis by means of personal funds of citizens, funds of juridical persons and other funds on the basis of contracts, including contracts of voluntary medical insurance (hereinafter - the contract).

2.3 Consumer - a natural person (the subject of personal data) who intends to receive or receives paid medical services in accordance with the contract of paid services.

2.4 Customer - a natural person (subject of personal data) who intends to order (purchase) or orders (purchases) paid medical services in accordance with the contract in favor of the consumer.

2.5 A person in charge - the employee(s) of the Clinic or the person(s) authorized by the Clinic who has access to the personal data of the subjects of personal data, which is necessary to perform his/her official (job) duties.

2.6 Personal data is any information relating directly or indirectly to a specific or identifiable individual - the subject of personal data.

2.7 The processing of personal data is any action (operation) or a set of actions (operations) with personal data performed with the use of automation equipment or without the use of such equipment, including collection, recording, systematization, accumulation, storage, elaboration (update, change), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data.

2.8 Automated processing of personal data - the processing of personal data by means of computer technology.

2.9 Dissemination of personal data - actions aimed at the disclosure of personal data to an indefinite circle of persons.

2.10 Provision of personal data - actions aimed at the disclosure of personal data to a certain person or a certain circle of persons.

2.11 Blocking of personal data - temporary termination of the processing of personal data (except if processing is necessary to elaborate personal data).

2.12 Destruction of personal data - 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 material medium of personal data is destroyed.

2.13 Depersonalization of personal data - actions, as a result of which it becomes impossible to determine whether the personal data belongs to a particular subject of personal data without the use of additional information.

2.14 Personal data information system - a set of personal data contained in databases and information technologies and technical means ensuring its processing.

2.15 Website - the official website of the Clinic on the Internet: <http://www.kivach.ru/>.

3. Legal grounds for processing personal data.

3.1 The legal grounds for the processing of personal data, in addition to the founding documents of the Clinic, is a set of regulatory legal acts, pursuant to which and in accordance with which the Clinic performs the processing of personal data, including:

- Federal Law No. 323-FZ dated 21 November 2011 "On the Basics of Health Protection of the Citizens of the Russian Federation»;

- Federal Law No. 152-FZ dated 27 July 2006 "On Personal Data»;

- Order of the Government of the Russian Federation dated 15 September 2008 No. 687 "On Approval of the Regulation on the Aspects of Personal Data Processing Carried Out without the Use of Automation Equipment»;

- Order of the Government of the Russian Federation dated 1 November 2012 No. 1119 "On Approval of the Requirements for the Protection of Personal Data during its Processing in Personal Data Information Systems»;

- other normative legal acts of the Russian Federation.

In addition, the processing of personal data at the Clinic is carried out in the course of employment relations and other relations directly related with such, in which the Clinic acts as an employer (Chapter 14 of the Labor Code of the Russian Federation), in connection with the implementation of the Clinic's rights and obligations as a legal person.

4. Basic rights and obligations of the Clinic and the subjects of personal data.

4.1 Rights and obligations of the subjects of personal data.

Subjects whose personal data is processed at the Clinic have the right:

1) gratuitously familiarize with the personal data, except for the cases provided by the Federal Law dated 27 July 2006 No. 152-FZ "On Personal Data";

2) to receive information concerning the processing of their personal data, including:

- confirmation of the fact of personal data processing by the Clinic;

- legal grounds and purposes of personal data processing;

- purposes and methods of personal data processing used by the Clinic;

- name and location of the Clinic, information about persons (except the Clinic's employees) who have access to personal data or to whom personal data may be disclosed on the basis of a contract with the Clinic or on the basis of Federal Law;

- processed personal data relating to the relevant subject of personal data, the source of its acquisition, unless a different procedure for the provision of such data is provided by Federal Law;

- timeframes for the processing of personal data, including timeframes of its storage;

- procedure for the implementation of rights provided by the Federal Law "On Personal Data" by the subject of personal data;

- information on the absence of cross-border data transfer;

- name or surname, name, patronymic and address of the person processing personal data on behalf of the Clinic, if the processing is entrusted or will be entrusted to such person;

- other information provided by the legislation of the Russian Federation;

3) require the Clinic to elaborate their personal data, block or destroy it if the personal data is incomplete, outdated, inaccurate, illegally obtained or is not necessary for the stated purpose of processing, as well as take legal measures to protect their rights;

4) to appeal against the actions or omission of the Clinic in the body authorized for the protection of the rights of personal data subjects or in court;

5) for the protection of the rights and legitimate interests, including compensation of losses and (or) moral damage compensation in a judicial order.

Subjects whose personal data is processed at the Clinic are obliged to:

- report reliable information about themselves and provide documents containing personal data, the content of which is established by the legislation of the Russian Federation and local regulations of the Clinic in the amount necessary for the purposes of processing;

- inform the Clinic if the personal data is renewed, changed.

4.2 Rights and obligations of the Clinic's employees processing personal data of personal data subjects.

Clinic employees processing personal data, depending on the purposes of processing specified in section 5 of this Policy, may:

- receive documents containing personal data;

- demand from the subject of personal data timely elaboration of the provided personal data;

- limit and/or not provide information to the subject of personal data, in cases and under the provisions of the current legislation of the Russian Federation;

- upon receipt of the consent of the subjects of personal data, transfer their personal data within the Clinic, including in electronic form through open communication channels on the Internet.

Clinic employees, processing personal data of subjects of personal data, are obliged to:

- process personal data received in accordance with the procedure established by the current legislation;

- to consider the appeals of the personal data subject (the legal representative of the personal data subject, the body authorized for the protection of the rights of personal data subjects) on the processing of his personal data and to give reasoned answers within the timeframe envisaged by the Federal Law "On Personal Data";

- provide the personal data subject (the legal representative of the personal data subject) with the possibility of free access to his/her personal data processed at the Clinic;

- take measures to elaborate, destroy the personal data of the subject of personal data in connection with his/her (legal representative) application with legitimate and reasonable requirements;

- not to disclose to third parties and not to distribute personal data without the written consent of the subject of personal data, unless otherwise provided by Federal law;

- if it is possible to obtain personal data from a third party, inform the personal data subject about the purposes, intended sources and methods of obtaining personal data, as well as about the nature of the personal data to be obtained and the consequences of refusing to give written consent to receive it;

- not disclose personal data of an employee for commercial purposes without his/her written consent;

- organize operational and archival storage of the Clinic's documents containing personal data of subjects of personal data, in accordance with the requirements of the legislation of the Russian Federation.

5. Purpose of personal data collection.

5.1 The purpose of the Policy is to ensure the protection of human and civil rights and freedoms while processing personal data. The processing of personal data is also carried out for the following purposes:

- ensuring compliance with the Constitution of the Russian Federation, Federal laws and other regulatory legal acts of the Russian Federation;

- execution of judicial acts, acts of other bodies or officials subject to execution in accordance with the legislation of the Russian Federation on enforcement proceedings;

- conducting educational and introductory and pre-graduate practical training;

- assisting candidates in employment, employees in obtaining education, ensuring personal safety of workers, controlling the quantity and quality of the performed work and ensuring safety of property;

- registering labor and other contractual relations, including the management of personnel records and personal files of employees, providing employees with vacations and sending them on business trips, organizing and registering the awards and bonuses of employees, organizing individual (personalized) registration of employees in the system of compulsory pension insurance, providing employees and members of their families with additional guarantees and compensation, including non-state pension provision, voluntary medical insurance, medical care and other types of social security;

- Clinic's performance of tasks and functions in the implementation of activities in accordance with the License for implementation of medical activities, as well as under the Federal Law dated 21 November 2011 No. 323-FZ "On the Basics of Health Protection of Citizens in the Russian Federation", other normative legal acts, the Charter of the Clinic and other local regulatory acts of the Clinic, including the conclusion of contracts and

completion of the Clinic its contract obligations, considering complaints and other applications of natural persons, processing requests of individuals for appointment, filling in medical records and other activities directly related to the provision of paid medical services to individuals;

- filling in and transferring to executive authorities and other authorized organizations of the required reporting forms;
- distribution of information and other materials on the activities of the Clinic;
- preparation, conclusion, execution and termination of civil and other contracts;
- formation of reference materials for internal information support of the Clinic;
- ensuring a single admission regime to the territory/buildings of the Clinic;
- the organization and carrying out by Clinic (including the involvement of the third parties) loyalty programs, marketing and/or advertising campaigns, researches and other actions.

6. The amount and categories of processed personal data, categories of personal data subjects.

6.1 Depending on the purposes provided in section 5 of this Policy, the Clinic may process personal data of the following categories of subjects:

6.1.1 Consumers (or their representatives), natural persons:

- personal data (sex, age, surname, name, patronymic; date, month, year of birth; place of birth);
- passport or other identity document details (series, number, issuing authority, date of issue and other information in such document) or birth certificate (for minors under fourteen years of age);
- address of registration (place of stay), actual residence;
- contact details (phone number; email address; etc.);
- information on the place of work;
- personal data provided (communicated) by the personal data subject by visiting (using) the site, sending an application form/order for the purchase of goods/services and other forms completed on the site, sending an e-mail message to the e-mail address: detox@kivach.ru or another email address with a domain name kivach.ru and its subdomains, or calling the call center of the Clinic by the following phone numbers: 8 (800) 100-80-30; 8 (8142) 599-880;
- other personal data provided at the discretion of the personal data subject, including marital status, children, marriage registration, health condition, which are necessary for ordering and/or rendering medical services provided by the Clinic.

6.1.2 Customers (individuals):

- surname, name, patronymic;
- sex;
- age;
- passport or other identity document details (series, number, issuing authority, date of issue and other information in such document)
- address of registration (place of stay) and actual residence;
- contact details (phone number; email address; etc.);
- personal data provided (communicated) by the personal data subject by visiting (using) the site, sending an application form/order for the purchase of goods/services and other forms completed on the site, sending an e-mail to the e-mail address: detox@kivach.ru or another email address with a domain name kivach.ru and its subdomains, or calling the call center of the Clinic by the following phone numbers: 8 (800) 100-80-30; 8 (8142) 599-880;
- other information that is necessary for ordering and rendering medical services provided by the Clinic directly to the consumer.

6.1.3 Clinic employees, including former employees:

- surname, name, patronymic;
- sex;
- age;
- photo;

- passport or other identity document details (series, number, issuing authority, date of issue and other information in such document);
- address of registration and actual residence;
- contact details (phone number; email address; etc.);
- taxpayer identification number;
- personal insurance policy number (SNILS)
- education, qualifications, professional training and information on professional development;
- academic degree, academic title (when they were awarded, registration numbers of diplomas, school certificates);
- marital status, children, family ties;
- information about employment, including the presence of bonuses, awards and/or disciplinary sanctions;
- information about having the command of foreign languages and languages of peoples of the Russian Federation;
- citizenship information;
- information about registration of marriage;
- information about military registration;
- criminal record information;
- information about the presence (absence) of administrative punishment for the consumption of narcotic drugs or psychotropic substances without a doctor's prescription or new potentially dangerous psychoactive substances;
- information about disability;
- information about alimony payments;
- information about income from the previous place of employment;
- contact details (phone number; email address; etc.);
- other personal data provided by employees in accordance with the requirements of labor legislation or which the subject of personal data wished to disclose.

6.1.4 Contractors (individual entrepreneurs):

- surname, name, patronymic;
- sex;
- age;
- passport or other identity document details (series, number, issuing authority, date of issue and other information in such document);
- address of registration (place of stay) and actual residence;
- contact details (phone number; email address; etc.);
- personal data provided (communicated) by the personal data subject by visiting (using) the site, sending an application form/order for the purchase of goods/services and other forms completed on the site, sending an e-mail message to the e-mail address: detox@kivach.ru or another email address with a domain name kivach.ru, or calling the call center of the Clinic by the following phone numbers: 8 (800) 100-80-30; 8 (8142) 599-880;
- other personal data provided by the personal data subject for the above mentioned purposes.

6.1.5 Persons included in the mailing list of information and other materials on the activities of the Clinic:

- surname, name, patronymic;
- sex;
- age;
- passport details;
- address of registration at the place of residence;
- information about the place of work;
- position;
- contact details (phone number; email address; etc.);
- other personal data that the personal data subject wished to disclose.

The clinic may create internal reference materials, which, with the written consent of the subject of personal data, unless otherwise provided by the legislation of the Russian Federation, may include:

- surname, name, patronymic;

- position;
- the name of the unit;
- contact details (phone number; email address; etc.);
- other personal data provided by the personal data subject for the specified purposes.

7. Procedure and conditions of personal data processing.

7.1 Processing of personal data is carried out with the consent of the subjects of personal data, unless otherwise provided by the legislation of the Russian Federation.

7.2 Processing of personal data can be carried out by means of computer technology (automated processing) or with the direct participation of a person without the use of computer technology (non-automated processing).

7.3 The processing of personal data, including the collection of personal data, can be carried out using information and telecommunication networks.

7.4 Any transfer of personal data by the subject of personal data to the Clinic, including the transfer using the Clinic's website on the Internet, electronic communication channels, telephone and other methods of information transfer, means the unconditional acceptance and consent of the subject of personal data with this Policy and the terms of processing of his personal data specified therein. In case of disagreement with these terms, the personal data subject shall refrain from transferring personal data.

7.5 The processing of personal data of personal data subjects whose data is processed for the purposes defined in section 5 of the Policy includes the following actions: collection (receipt), recording, systematization, accumulation, storage, elaboration (update, change), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data.

7.10 Timeframes for the storage of personal data by the Clinic are determined in accordance with the current legislation of the Russian Federation.

8. Access to personal data.

8.1 The personal data subject has the right to access his/her personal data.

8.2 The right of the subject to access to his/her personal data shall be exercised in accordance with the procedure established by the current legislation and this Policy.

8.3 The clinic is obliged to provide the subject of personal data with the opportunity to get acquainted with the personal data relating to this subject of personal data.

8.4 The basis for the familiarization of the personal data subject with personal data relating to the data subject is the personal data subject's written request for the provision of personal data for familiarization.

8.5 The clinic undertakes to provide an opportunity to get acquainted with the personal data relating to the relevant personal data subject within thirty days from the date of receipt of the request of the personal data subject to provide personal data for familiarization.

8.6 The request of the personal data subject must contain:

- number of the main identity document of the subject of personal data, information on the date of issue of the above mentioned document and the issuing authority,
- information confirming the relations between the personal data subject and the operator (contract number, date of conclusion of the contract, conditional verbal denotation and (or) other information), or information otherwise confirming the fact of the processing of personal data by the operator,
- signature of the personal data subject;
- other information provided by the legislation of the Russian Federation.

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

8.7 In case the written request of personal data subject is not compliant with the requirements of applicable law and/or this Policy, the Clinic may send the personal data subject or his representative a notice stating the necessity to draft the request according to the requirements of applicable law and/or this Policy. In this case, the access of the personal data subject to his personal data is provided after the Clinic receives a correct written request from the personal data subject, drafted in accordance with the requirements of the current legislation and this Policy.

8.8 Familiarization of the subject of personal data with his personal data is carried out in the premises of a separate unit of the Clinic, located in the village of Konchezero, Kondopozhsky district of the Republic of Karelia.

9. Confidentiality

9.1 The clinic is obliged not to disclose the personal data of subjects of personal data received by it, except for the cases envisaged in the legislation of the Russian Federation.

9.2 Transfer (distribution, provision) and use of personal data of personal data subjects, whose data is processed for the purposes specified in section 5 of the Policy, is carried out only in cases and in the manner prescribed by the legislation of the Russian Federation.

9.3 The confidentiality of personal data is dropped in cases of its depersonalization, as well as in case when personal data is made publicly available by the subject of personal data or included (obtained) in publicly available sources of personal data.

10. Information about the implemented requirements for the protection of personal data.

10.1 The clinic takes necessary and sufficient measures to protect personal data from accidental or unauthorized access, destruction, elaboration, copying, distribution, blocking and other unauthorized actions performed with it by third parties.

10.2 To ensure the necessary level of protection of personal data during its processing by the clinic, the following requirements are fulfilled (implemented):

- organization of the security regime of the premises in which the information system is located, preventing the possibility of uncontrolled penetration or stay in these premises of persons who do not have the right to access these premises;
- ensuring the safety of personal data mediums;
- the head of the operator approves the document that defines the list of persons whose access to personal data processed in the information system is necessary for the performance of their official (labor) duties;
- the use of information security tools that have passed the procedure of conformity assessment with the requirements of the legislation of the Russian Federation in the field of information security, in case when the use of such tools is necessary to neutralize current threats;
- appointment of an employee responsible for ensuring the security of personal data in the information system.

10.3 Liability for violation of the requirements of the legislation of the Russian Federation and local acts of the Clinic in the field of processing and protection of personal data is determined in accordance with the legislation of the Russian Federation.

11. Final provisions.

11.1 The clinic has the right to make changes to this Policy.

The new version of the Policy shall enter into force from the moment of its placement (publication), unless otherwise provided by a new version of the Policy. The current version is constantly available on the Clinic's website on the Internet at: <http://www.kivach.ru/>

11.2 The law of the Russian Federation applies to this Policy and the relations between the Clinic and the subjects of personal data.

11.3 All other relations of the Clinic and subjects of personal data are determined by the legislation of the Russian Federation in the field of personal data.