

**THE VYZOV FOUNDATION FOR SCIENTIFIC AND CULTURAL
RELATIONS
(THE VYZOV FOUNDATION)**

PERSONAL DATA PROCESSING POLICY

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KEY DEFINITIONS

Automated processing of personal data – processing of personal data using computer technology.

Biometric personal data – information characterizing the physiological and biological features of a person, on the basis of which their identity can be established.

Blocking of personal data – temporary suspension of the processing of personal data (except where processing is necessary to clarify the personal data).

Personal data information system – a set of personal data contained in databases and the information technologies and technical means ensuring their processing.

Non-automated processing of personal data – processing of personal data carried out without the use of automation tools.

De-identification (anonymization) of personal data – actions as a result of which it becomes impossible, without the use of additional information, to determine that personal data belongs to a specific data subject.

Processing of personal data – any action (operation) or set of actions (operations) performed on personal data, whether or not using automation tools, including collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, transfer (disclosure, provision, access), de-identification, blocking, deletion, and destruction of personal data.

Personal data controller (Controller) – the Vyzov Foundation For Scientific And Cultural Relations (INN: 9731116769, KPP: 773101001, OGRN: 1237700439019), which independently organizes and carries out the processing of personal data, determines the purposes of processing, the composition of the personal data to be processed, and the actions (operations) performed on personal data.

Personal data – any information relating to a directly or indirectly identified or identifiable individual (personal data subject).

Disclosure of personal data – actions aimed at disclosing personal data to an indefinite number of persons.

Cross-border transfer of personal data – the transfer of personal data to the territory of a foreign state to a foreign government authority, a foreign individual, or a foreign legal entity.

Destruction of personal data – actions as a result of which it becomes impossible to restore the content of personal data in the information system and (or) as a result of which the physical media containing personal data are destroyed.

1. GENERAL PROVISIONS

1.1. This Personal Data Processing Policy (hereinafter – the Policy) has been adopted by the The Vyzov Foundation for Scientific and Cultural Relations (hereinafter – the Foundation/Controller) for the purposes of:

- complying with the requirements of the legislation of the Russian Federation in the field of personal data;
- ensuring the rights and freedoms of personal data subjects;
- maintaining the business reputation of the Foundation and the National Award in the Field of Future Technologies “VYZOV” (hereinafter – the Award);
- ensuring unrestricted access to information about the Controller’s personal data processing policy in accordance with Part 2, Article 18.1 of Federal Law No. 152-FZ “On Personal Data” dated 27.07.2006.

1.2. The Policy applies to all personal data processing carried out by the Foundation as a controller – including in connection with the operation of the Foundation’s official websites (fondvyzov.ru, fondvyzov.com, премиявызов.рф, vyzovprize.com, hereinafter jointly – the Website), the conduct of the Award, and the Foundation’s business and personnel activities.

1.3. The Policy has been developed in accordance with:

- Federal Law No. 152-FZ “On Personal Data” dated 27.07.2006;
- Federal Law No. 149-FZ “On Information, Information Technologies and the Protection of Information” dated 27.07.2006;
- Decree of the Government of the Russian Federation No. 1119 dated 01.11.2012 “On Approval of Requirements for the Protection of Personal Data during Their Processing in Personal Data Information Systems”;
- Decree of the Government of the Russian Federation No. 687 dated 15.09.2008 “On Approval of the Regulation on the Specifics of Processing Personal Data Carried Out Without the Use of Automation Tools”;
- Order of the FSTEC of Russia No. 21 dated 18.02.2013 “On Approval of the Composition and Content of Organizational and Technical Measures to Ensure the Security of Personal Data”;
- Order of Roskomnadzor No. 18 dated 24.02.2021 “On Approval of Requirements for the Content of Consent to the Processing of Personal Data Permitted by the Personal Data Subject for Disclosure”;
- Order of Roskomnadzor No. 180 dated 14.10.2022 “On Approval of Requirements for Harm Assessment”;
- other regulatory legal acts of the Russian Federation in the field of personal data.

1.4. The Foundation considers ensuring the legitimacy of processing and the security of subjects’ personal data in all business processes to be a top priority. To this end, a personal data protection system has been implemented, is in operation, and undergoes periodic review.

2. PURPOSES AND PRINCIPLES OF PERSONAL DATA PROCESSING

2.1. The Foundation processes personal data for the following purposes:

2.1.1. Personal data of the Foundation's employees is processed for the purposes of:

- organizing personnel, accounting, and tax records, as well as records of insurance premium payers;
- assisting employees in obtaining education and career advancement;
- concluding voluntary medical insurance contracts;
- carrying out social activities arising in the course of employment;
- ensuring access control at the Foundation's premises, monitoring work quality, and ensuring personal safety.

2.1.2. Personal data of candidates for vacant positions at the Foundation is processed for the purposes of:

- ensuring compliance with the legislation of the Russian Federation during employment;
- assessing the candidate's professional and personal qualities.

2.1.3. Personal data of members of the Foundation's governing bodies (the Board of Trustees, the Scientific Committee) is processed for the purposes of:

- ensuring the activities of the Foundation's governing bodies;
- ensuring access control at the Foundation's premises.

2.1.4. Personal data of the Foundation's counterparties and partners (individuals, including representatives of legal entities) is processed for the purposes of:

- concluding and performing civil-law contracts;
- ensuring interaction with the Award's partners.

2.1.5. Personal data of Applicants, Participants, Authors, Co-Authors, Experts, Laureates, and Co-Laureates of the Award is processed for the purposes of:

- accepting, registering, reviewing, and supporting Applications to participate in the Award;
- verifying that Applications and Participants comply with the requirements of the Award Regulations, including verifying the absence of foreign agent status and compliance with academic and scientific ethics standards;
- identifying individuals and confirming the legal status of Participants;
- conducting expert evaluation by the Scientific Committee and Experts;
- making decisions on admission to participate, forming long lists and short lists, and determining Laureates and Co-Laureates;
- organizing participation in the Award Ceremony and other Award events;
- paying monetary prizes and performing the functions of a tax agent in accordance with the tax legislation of the Russian Federation;
- providing informational support for the Award: coverage in the media, on the Internet, and on social networks – subject to the relevant consents.

2.1.6. Personal data of Website visitors that is automatically transmitted while using the Website (including IP address, cookie data, browser and equipment information, date and time of access, and addresses of requested pages), is processed for the purposes of:

- ensuring the normal and secure operation of the Website;
- identifying the personal data subject and establishing feedback through the Website's forms;

- providing the subject with access to the functionality and content of the Website, including the personal account and the Application submission form;
- analyzing the composition of the Website's audience in order to improve service quality;
- sending informational and other mailings, subject to the relevant consent.

2.2. The processing of personal data is based on the following principles:

- the lawfulness of the purposes and methods of processing, and good faith;
- the compliance of the purposes of processing with the purposes determined in advance at the time of collecting personal data;
- the compliance of the volume and nature of the data processed with the purposes of processing (the inadmissibility of excessive processing);
- the accuracy of personal data, and its relevance and sufficiency for the purposes of processing;
- the legitimacy of organizational and technical security measures;
- the continuous improvement of employees' knowledge in the field of personal data security.

3. CATEGORIES OF DATA SUBJECTS AND LIST OF PERSONAL DATA PROCESSED

3.1. This Policy establishes the following categories of personal data subjects:

- 1) employees of the Foundation;
- 2) candidates for vacant positions at the Foundation;
- 3) members of the Foundation's governing bodies (who are not employees);
- 4) counterparties and partners of the Foundation – individuals and representatives of legal entities;
- 5) Applicants, Participants, Authors, Co-Authors, Experts, Laureates, and Co-Laureates of the Award;
- 6) visitors and registered users of the Website.

3.2. List of personal data by category of data subject:

3.2.1. Employees of the Foundation:

last name, first name, patronymic; passport details; INN; SNILS; date and place of birth; citizenship; registration and actual residence address; contact phone number; e-mail address; information on education; information on position and employment contract; salary information; information on previous places of employment and length of service; foreign passport details; bank details; information on military registration status.

3.2.2. Candidates for vacant positions:

last name, first name, patronymic; contact details (phone, e-mail); information on education; information on previous places of employment and length of service; other data voluntarily provided by the candidate in the resume.

3.2.3. Members of the Foundation's governing bodies:

last name, first name, patronymic; passport details; INN; SNILS; contact details; bank details; information on education and academic achievements.

3.2.4. Counterparties and partners (individuals):

last name, first name, patronymic; passport details; INN; SNILS; bank details; contact details.

3.2.5. Applicants, Participants, Experts, Laureates, Co-Laureates of the Award:

last name, first name, patronymic; date, month, year, and place of birth; gender; citizenship; passport details (including a scanned copy); registration and (or) residence address; contact phone number; e-mail address; photograph; information on education, academic degree, academic title; place of employment and position; professional experience and information on academic activity; bank details (for prize payment); information confirming the absence of foreign agent status; other information contained in documents submitted in connection with participation in the Award.

3.2.6. Visitors and registered users of the Website:

last name, first name, patronymic; e-mail address; contact phone number; place of employment and position; data automatically transmitted while using the Website: IP address, cookie file data in accordance with Appendix No. 1 to this Policy, browser and equipment information, date and time of access.

3.3. The Controller does not process special categories of personal data relating to race and nationality, political views, religious or philosophical beliefs, health status, or intimate life, except in cases expressly provided for by the legislation of the Russian Federation.

3.4. Biometric personal data is not processed by the Controller, except for a photographic image, subject to the separate written consent of the subject in accordance with Article 11 of Federal Law No. 152-FZ.

4. LEGAL GROUNDS FOR PERSONAL DATA PROCESSING

4.1. The legal grounds for the processing of personal data are:

- Federal Law No. 152-FZ “On Personal Data” dated 27.07.2006;
- the Labor Code of the Russian Federation;
- the Civil Code of the Russian Federation;
- the Tax Code of the Russian Federation;
- Federal Law No. 7-FZ “On Non-Commercial Organizations” dated 12.01.1996;
- Federal Law No. 129-FZ “On State Registration of Legal Entities and Individual Entrepreneurs” dated 08.08.2001;
- Federal Law No. 402-FZ “On Accounting” dated 06.12.2011;
- the Foundation’s Charter;
- the Regulations on the National Award in the Field of Future Technologies “VYZOV”;
- the consent of the personal data subject (in cases provided for by the legislation of the Russian Federation), executed as a separate independent document in accordance with Part 4, Article 9 of Federal Law No. 152-FZ;
- contracts concluded with personal data subjects.

5. PROCEDURE AND CONDITIONS FOR PERSONAL DATA PROCESSING

5.1. Personal data is processed both using automation tools and without their use, including: collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, transfer (disclosure, provision, access), de-identification, blocking, deletion, and destruction.

5.2. Personal data is collected in the following ways:

- receipt from the personal data subject in the form of copies (originals) of documents and completed forms in written and electronic form;
- receipt from third parties in cases and in the manner provided for by law;
- receipt from open sources (public registers, organizations' official websites, academic databases, mass media, social networks);
- automatic transmission of technical data while using the Website.

5.3. The storage of personal data of citizens of the Russian Federation is carried out exclusively using databases located in the territory of the Russian Federation, in accordance with Part 5, Article 18 of Federal Law No. 152-FZ.

5.4. When processing cookies, the Foundation uses exclusively Russian web analytics services (Yandex.Metrica). The collection, recording, systematization, and storage of data are carried out using the servers of Yandex LLC, located in the territory of the Russian Federation.

5.5. Maximum periods for the processing of personal data:

Category of Subjects	Retention Period
Foundation employees	For the duration of the employment relationship and after its termination – in accordance with the requirements of the legislation of the Russian Federation
Candidates	3 years from the date of receipt of the resume (if not hired)
Award Participants, Laureates	For the duration of the Award and 10 years after the Award is granted (with respect to the Laureate's public status); financial documents – at least 5 years (Tax Code, Federal Law No. 402-FZ)
Applicants (who did not become Laureates)	3 years from the end of the relevant Award cycle
Website users (cookies, technical data)	Until the purposes of processing are achieved or consent is withdrawn; technical data – no more than 1 year
Counterparties	For the duration of the contract and 3 years after its termination (Article 196 of the Civil Code of the RF)

Upon expiration of the specified periods, personal data is destroyed or de-identified, unless otherwise provided by the legislation of the Russian Federation or a contract.

5.6. The Foundation has the right to transfer personal data to the following categories of third parties:

- members of the Scientific Committee and engaged Experts – to the extent necessary for the independent evaluation of Applications;
- Award partners (including Gazprombank PJSC and media partners) – to the extent necessary for organizing and providing informational support for the Award;
- persons providing transportation, hotel, visa, and other organizational services;
- persons providing legal, accounting, audit, and other professional services on behalf of the Foundation;
- authorized government authorities – in cases provided for by the legislation of the Russian Federation.

5.7. Third parties to whom personal data has been transferred on behalf of the Foundation are obliged to maintain confidentiality and ensure the security of the transferred data to the extent established by the Foundation.

5.8. The Foundation has no right to disclose personal data to third parties or distribute it without the subject's consent, unless otherwise provided by the legislation of the Russian Federation and this Policy.

5.9. The destruction of personal data is carried out no later than 30 (thirty) days from the date the grounds for terminating processing arise, unless otherwise provided by the legislation of the Russian Federation. The fact of destruction is recorded in a personal data destruction report.

6. CROSS-BORDER TRANSFER OF PERSONAL DATA

6.1. Due to the international nature of the Award, the Foundation may carry out cross-border transfer of personal data to foreign individuals and legal entities – participants, experts, partners, and organizers of related events abroad.

6.2. Cross-border transfer of personal data is carried out subject to the following conditions:

- a) the initial collection, recording, systematization, and storage of the personal data of Russian citizens is carried out exclusively on servers located in the territory of the Russian Federation;
- b) before commencing a cross-border transfer, the Foundation submits to Roskomnadzor a notice of its intention to carry out such a transfer in the manner established by Parts 3–7, Article 12 of Federal Law No. 152-FZ;
- c) adequate protection of the rights of personal data subjects is ensured in the foreign state, or the subject's written consent has been obtained, or the transfer is carried out in other cases expressly provided for by the legislation of the Russian Federation.

6.3. The Foundation enters into agreements with foreign recipients of personal data that provide for obligations to ensure the confidentiality and security of the data received.

7. CONSENT TO THE PROCESSING OF PERSONAL DATA

7.1. Consent to the processing of personal data is executed exclusively as a separate independent document, apart from other documents signed or accepted by the subject.

7.2. Consent to the processing of personal data for the purposes of using the Website and the personal account is provided by the subject by activating a separate checkbox in the registration form. The checkbox cannot be pre-checked by default. The text of the consent is posted at: fondvyzov.ru/soglasie-na-opd/.

7.3. Consent to participate in the Award, which includes consent to the processing of data for the purposes of Clause 2.1.5 of this Policy, is provided by the subject when submitting an Application by signing (accepting) the relevant consent form. Submission of an Application without providing the required consents is not permitted.

7.4. Consent to the disclosure of personal data is a separate independent document in accordance with Article 10.1 of Federal Law No. 152-FZ and Order of Roskomnadzor No. 18 dated 24.02.2021, and is provided separately from consent to processing.

7.5. Procedure and consequences of withdrawal of consent:

7.5.1. The personal data subject has the right to withdraw consent by sending a written notice to the Controller at its registered address or by e-mail: privacy@fondvyzov.ru.

7.5.2. Withdrawal of consent provided for the purposes of participating in the Award results in the inability to continue participation and may serve as grounds for disqualification in accordance with the Award Regulations.

7.5.3. Withdrawal of consent does not affect the lawfulness of processing carried out prior to its receipt by the Controller.

7.5.4. After receiving a notice of withdrawal, the Controller shall cease processing within 30 (thirty) days, unless otherwise provided by the legislation of the Russian Federation.

8. REQUIREMENTS FOR ENSURING THE SECURITY OF PERSONAL DATA

8.1. The Foundation's management recognizes the need for, and is committed to, ensuring an appropriate level of personal data security – both from the standpoint of the requirements of the legislation of the Russian Federation and from the standpoint of risk assessment.

8.2. To ensure the security of personal data during its processing, the Foundation implements the requirements of the following regulatory documents:

- Federal Law No. 152-FZ “On Personal Data” dated 27.07.2006;
- Decree of the Government of the Russian Federation No. 1119 dated 01.11.2012;
- Decree of the Government of the Russian Federation No. 687 dated 15.09.2008;
- Order of the FSTEC of Russia No. 21 dated 18.02.2013.

8.3. The following organizational measures are in place at the Foundation:

- persons responsible for organizing the processing and ensuring the security of personal data have been appointed;
- local regulations on personal data processing have been developed and approved;
- internal monitoring is carried out to ensure that personal data processing complies with legal requirements;
- an assessment is conducted of the harm that may be caused to personal data subjects, and current security threats are identified (Order of Roskomnadzor No. 180 dated 14.10.2022);
- a list has been approved of persons whose access to personal data is necessary for the performance of their official duties;
- all persons authorized to process personal data have been familiarized with the requirements of the legislation of the Russian Federation and the Foundation's local regulations.

8.4. The following technical measures are implemented at the Foundation:

- physical security is provided for the premises in which personal data is processed;
- information on paper media is stored in lockable cabinets/safes;
- the exchange of personal data over communication channels is protected through the use of organizational and technical means (anti-virus protection, firewalling);
- identification and authentication of information system users is carried out;
- backup and recovery of personal data is ensured.

8.5. In the event of detecting an incident resulting in a leak (unauthorized disclosure) of personal data, the Foundation is obliged to notify Roskomnadzor:

- within 24 hours of detection – of the fact of the incident;
- within 72 hours – of the results of the internal investigation and the measures taken.

9. RIGHTS OF PERSONAL DATA SUBJECTS

9.1. The personal data subject has the right to:

- a) receive information about the processing of their personal data, including: confirmation of the fact of processing; the legal grounds and purposes; the methods used; the name and location of the Controller; information on the persons to whom personal data is disclosed; a list of the data processed and the source of its receipt; the periods of processing and storage; and the procedure for exercising the subject's rights;
- b) demand the clarification, blocking, or destruction of personal data if it is incomplete, outdated, inaccurate, unlawfully obtained, or not necessary for the stated purpose of processing;
- c) withdraw consent to the processing of personal data;
- d) demand the cessation of processing and destruction of personal data in cases provided for by law;
- e) demand that unlawful actions in respect of personal data be remedied;

f) appeal the actions or omissions of the Controller to the Federal Service for Supervision of Communications, Information Technology, and Mass Media (Roskomnadzor): 109074, Moscow, Kitaygorodsky proezd, 7, bldg. 2; website: rkn.gov.ru; phone: 8-800-222-15-07), or in court.

9.2. To exercise their rights, the subject shall send a written request to the address: 12, bldg. 1, 2nd Kadashevsky pereulok, Yakimanka intracity municipal district, Moscow, 115035, Russia, or to e-mail: privacy@fondvyzov.ru.

The response period for a subject's request is 30 (thirty) calendar days.

10. FINAL PROVISIONS

10.1. The Foundation has the right to unilaterally amend this Policy. The new version takes effect from the moment it is posted on the Website, unless otherwise established by the new version.

10.2. The current version of the Policy is posted on the Website at: fondvyzov.ru/politika/.

10.3. The Foundation recommends that personal data subjects regularly review the terms of the Policy.

10.4. In all matters not provided for by this Policy, the Foundation is guided by the requirements of the current legislation of the Russian Federation.

10.5. No provision of this Policy may be construed as limiting the rights and legitimate interests of personal data subjects.

DETAILS OF THE CONTROLLER

Full name: The Vyzov Foundation for Scientific and Cultural Relations

Abbreviated name: The Vyzov Foundation

INN/KPP: 9731116769/773101001

OGRN: 1237700439019

Legal address: 12, bldg. 1, 2nd Kadashevsky pereulok, Yakimanka intracity municipal district, Moscow, 115035, Russia

E-mail (for personal data matters): privacy@fondvyzov.ru

Official website: fondvyzov.ru

General Director: N.V. Tretiak

LIST OF COOKIE FILES USED ON THE WEBSITE FONDVYZOV.RU

Yandex.Metrica service – provider Yandex LLC
(data is stored on servers located in the territory of the Russian Federation)

Cookie Name	Duration	Description
_ym_metrika_enabled	60 minutes	Checks the correct installation of other Metrica cookies
_ym_isad	2 days	Detects whether the visitor has ad blockers
_ym_uid	1 year	Unique identifier of the website visitor
_ym_d	1 year	Date of the visitor's first visit
yabs-sid	Session	Visit identifier
_ym_debug	Session	Debug mode indicator
_ym_mp2_substs	Session	Operation of the Target Call service
ym_visorc	30 minutes	Correct operation of Webvisor (session recording)
_ym_hostIndex	1 day	Limiting the number of requests
_ym_mp2_track	30 days	Target Call service
i	1 year	Visitor identifier
yandexuid	1 year	Unique Yandex identifier for the visitor
ymex	1 year	Auxiliary information: time of identifier creation
usst	1 year	Synchronization of identifiers across Yandex domains
Technical session cookies – provider The Vyzov Foundation		
PHPSESSID/ session_id	Session	Session identifier (authorization, forms)
csrf_token	Session	Protection against CSRF attacks
cookie_consent	12 months	Stores the user's choice in the cookie banner
auth_token	30 days	Maintains authorization (option: remember me)

The processing of analytical cookies is carried out only with the prior consent of the User, obtained through the cookie banner upon first visiting the Website.

Technical session cookies are set automatically without consent.