

# PRIVACY POLICY

Updated: May 25, 2025

## 1. GENERAL PROVISIONS

1.1. This Privacy Policy (hereinafter referred to as the "Policy") defines the procedure for processing personal data of users of the association-cfo.ru website, owned by the Association of Interregional Social and Economic Cooperation "Central Federal District" (hereinafter referred to as the "Association", "Organization", "Operator").

1.2. The Policy is developed in accordance with the requirements of Federal Law No. 152-FZ of July 27, 2006 "On Personal Data" and other regulatory legal acts of the Russian Federation.

### 1.3. Personal data operator:

- **Full name:** Association of Interregional Social and Economic Cooperation "Central Federal District"
- **Legal address:** Moscow, Tverskoy municipal district, Ilyinka str., 4, room 84/3
- **Tax ID (INN):** 7709472937
- **Primary State Registration Number (OGRN):** 1137799007994
- **Executive Director:** Chayka Yuri Afanasyevich
- **Email:** [info@ascfd.ru](mailto:info@ascfd.ru)
- **Website:** association-cfo.ru

1.4. Use of the Website means the User's consent to this Policy and the personal data processing conditions specified therein.

## 2. BASIC CONCEPTS

**Personal data** — any information relating to a directly or indirectly identified or identifiable natural person (personal data subject).

**Personal data processing** — any action or set of actions performed using automation tools or without using such tools with personal data.

**User** — a natural person visiting the Website or participating in Association activities.

## 3. PERSONAL DATA PROCESSING BY PURPOSES

### 3.1. PURPOSE: Maintaining the registry of Association members

**Subject categories:** Representatives of Central Federal District regions, Association members

**Categories and list of processed personal data:**

- Last name, first name, middle name
- Position in Central Federal District regional government authorities
- Name of represented region
- Contact information (phone, email, work address)
- Powers regarding interregional cooperation matters

**Processing methods:** Mixed (automated and non-automated)

**Processing period:** During the period of Association membership

**Storage period:** 5 years after termination of membership

**Destruction procedure:** Upon expiration of the storage period, personal data is deleted from all information systems through irreversible deletion of electronic records and physical destruction of paper media with compilation of a destruction act

**3.2. PURPOSE: Organization and conduct of interregional events**

**Subject categories:** Participants of conferences, forums, seminars, expert groups

**Categories and list of processed personal data:**

- Last name, first name, middle name
- Place of work, position, specialization
- Contact information (phone, email)
- Professional interests and area of expertise
- Region of residence/work

**Processing methods:** Automated

**Processing period:** From event registration until its completion plus 36 months for effectiveness analysis

**Storage period:** 2 years after completion of processing

**Destruction procedure:** Upon expiration of the storage period, personal data is deleted from all information systems through irreversible deletion of electronic records with compilation of a destruction act

**3.3. PURPOSE: Publishing activities and preparation of analytical materials**

**Subject categories:** Publication authors, experts, consultants

**Categories and list of processed personal data:**

- Last name, first name, middle name
- Academic degrees, titles, professional achievements
- Place of work and position
- Contact information

- Areas of expertise and research interests

**Processing methods:** Mixed (automated and non-automated)

**Processing period:** From material preparation until publication plus 60 months for maintaining publication archives

**Storage period:** 3 years after completion of processing

**Destruction procedure:** Upon expiration of the storage period, personal data is deleted from all information systems through irreversible deletion of electronic records and physical destruction of paper media with compilation of a destruction act

### **3.4. PURPOSE: Informing about Association activities**

**Subject categories:** Newsletter subscribers, event participants, partners

**Categories and list of processed personal data:**

- Last name, first name, middle name
- Email address
- Area of professional interests
- Information receiving preferences

**Processing methods:** Automated

**Processing period:** Until consent withdrawal, but no more than 24 months from the last interaction

**Storage period:** 6 months after consent withdrawal for processing possible claims

**Destruction procedure:** Upon expiration of the storage period, personal data is deleted from all marketing systems through irreversible deletion with compilation of a destruction act

### **3.5. PURPOSE: Interaction with government authorities**

**Subject categories:** Government representatives, officials

**Categories and list of processed personal data:**

- Last name, first name, middle name
- Position and place of work
- Official contact information
- Competence and powers

**Processing methods:** Mixed (automated and non-automated)

**Processing period:** During the term of office plus 24 months

**Storage period:** 5 years after completion of processing in accordance with archival legislation requirements

**Destruction procedure:** Upon expiration of the storage period, personal data is deleted from all information systems through irreversible deletion of electronic records and physical destruction of paper media with compilation of a destruction act

### **3.6. PURPOSE: Compliance with Russian Federation legislation requirements**

**Subject categories:** All personal data subjects

**Categories and list of processed personal data:**

- All personal data specified in purposes 3.1-3.5

**Processing methods:** Mixed (automated and non-automated)

**Processing period:** In accordance with current Russian Federation legislation requirements

**Storage period:** In accordance with current Russian Federation legislation requirements

**Destruction procedure:** Upon expiration of periods established by Russian Federation legislation, personal data is destroyed through irreversible deletion of electronic records and physical destruction of paper media with compilation of a destruction act

## **4. INFORMATION ON USE OF METRIC PROGRAMS AND COOKIES**

The following metric programs are used on the association-cfo.ru website:

### **4.1. Yandex.Metrica**

**Purpose of use:** Analysis of website traffic and user behavior

**Processed data:** IP address, cookie files, browser data, visit time, viewed pages

**Server location:** Russian Federation

**Cookie storage period:** 2 years

**IMPORTANT:** Before starting personal data processing using Yandex.Metrica metric program, an information window requesting consent for cookie use is displayed on the website. The user can refuse cookie use.

## **5. LEGAL BASIS FOR PROCESSING**

5.1. Personal data processing is carried out based on:

- Consent of the personal data subject
- Necessity of participation in Association activities
- Necessity of complying with the operator's legal obligations
- Legitimate interests of the operator for developing interregional cooperation

## **6. TRANSFER OF PERSONAL DATA TO THIRD PARTIES**

6.1. We may transfer personal data to the following categories of recipients within the framework of achieving the specified processing purposes:

### **Government authorities:**

- Administration of the Presidential Plenipotentiary Representative in the Central Federal District
- Regional authorities of Central Federal District subjects
- Ministry of Economic Development of the Russian Federation
- Other federal executive authorities

### **Partner organizations:**

- Associations of other federal districts
- Interregional associations and unions
- Regional chambers of commerce and industry
- Public organizations and NGOs

### **Educational and scientific organizations:**

- Universities and research institutes
- Expert and analytical centers

### **Technical contractors:**

- IT service providers (for website support)
- Event and conference organizers
- Publishing houses (for material publication)

### **Government bodies:**

- Upon receipt of official requests within the framework of current Russian Federation legislation

## **7. SECURITY ASSURANCE**

7.1. We take necessary technical and organizational measures to protect personal data:

- Use of secure communication channels (HTTPS)
- Restriction of access to personal data
- Application of antivirus protection means
- Data backup
- Physical protection of servers and archives
- Personnel training on information protection issues
- Compliance with information protection requirements in government organizations

## 8. PERSONAL DATA SUBJECT RIGHTS

8.1. You have the right to:

- Receive information about processing of your personal data
- Require clarification, blocking or destruction of inaccurate data
- Withdraw consent for personal data processing
- Appeal operator actions to Roskomnadzor or through judicial procedure
- Demand compensation for damages in case of legislation violation

8.2. To exercise your rights, contact: [info@ascfd.ru](mailto:info@ascfd.ru)

## 9. POLICY CHANGES

9.1. We reserve the right to make changes to this Policy in connection with:

- Changes in Russian Federation legislation
- Development of Association activities
- Changes in data processing technologies

9.2. The current version of the Policy is always available on this page.

## 10. CONTACT INFORMATION

For all questions related to personal data processing, contact:

**Legal address:** Moscow, Tverskoy municipal district, Ilyinka str., 4, room 84/3

**Tax ID (INN):** 7709472937

**Primary State Registration Number (OGRN):** 1137799007994

**Executive Director:** Chayka Yuri Afanasyevich

**Email:** [info@ascfd.ru](mailto:info@ascfd.ru)

**Website:** [association-cfo.ru](http://association-cfo.ru)

**Request processing time:** within 30 days from receipt

*This Privacy Policy comes into effect from the moment of its posting on the Website, unless otherwise provided by a new version of the Privacy Policy.*