**Privacy** **and Personal Data Processing Policy**

1. **General Information. Used Terms.**

This Privacy and Personal Data Processing Policy concerned with personal data processing (hereinafter referred to as the “Policy”) was developed to ensure protection of man and citizen’s rights and freedoms during processing of their personal data, including protection of the rights of privacy, personal and family secrets, when organizing and holding the Khaled Alkhateb International Memorial Awards by Autonomous Non-Profit Organization TV-Novosti.

Terms and definitions:

Contest – Khaled Alkhateb International Memorial Awards.

Website – a website on the Internet found at: <https://award.rt.com>.

Organization – Autonomous Non-Profit Organization TV-Novosti located at: Bldg 1, 3 Borovaya Street, Moscow, Russian Federation, 111020 (PSRN: 1057746595367, TIN (taxpayer identification number): 7704552473).

User – an individual being a personal data subject (an identifiable individual) who provides and has access to the Website via the Internet and who has undergone registration (submitted an application) and accepted the terms and conditions of the Policy.

Personal data – any information that may directly or indirectly identify the User.

Operator (Controller) – Autonomous Non-Profit Organization TV-Novosti that independently or together with other persons ensures and (or) performs Personal Data processing, as well as determines Personal Data processing purposes, composition of the Personal Data to be processed, actions (operations) performed with Personal Data.

Applicable law – the current legislation of the Russian Federation and/or the legislation of the European Union (if applicable), in particular, Regulation No. 2016/679 of the European Parliament and the Council of the European Union on the protection of natural persons with regard to the processing of personal data and the free movement of such data, and repealing Directive 95/46/ЕС (General Data Processing Regulation) that is applicable in connection with Contest organization and holding.

Other terms and definitions in the Policy shall be used in compliance with their meanings defined in the Applicable Personal Data Law.

Using the Website shall mean User’s unconditional voluntary consent to processing User’s Personal Data and User’s acceptance of the Policy conditions, as well as the conditions of processing User’s Personal Data specified in it. In case of disagreement with these conditions, The User shall refrain from using the Website.

The Policy shall apply to all Personal Data processed by the Operator when the User uses the Website.

The Policy will remain in force indefinitely after its approval and until it is replaced by a new
version.

Control over compliance with the Policy requirements shall be exercised by an authorized person responsible for ensuring Personal Data processing at the Organization.

1. Rights and Obligations of the Organization as the Personal Data Operator and of the User as the Personal Data Subject.
	1. The Organization shall have the right:
* to independently determine the composition and list of measures necessary and sufficient to ensure discharge of the obligations established by the Applicable Personal Data Law and the regulations adopted in accordance with it, unless otherwise provided for by the Applicable Law;
* to entrust Personal Data processing to another person with the consent of the personal data subject, unless otherwise provided for by the Applicable Law, based on an agreement concluded with this person. The person processing Personal Data on behalf of the Organization shall comply with the Personal Data processing principles and rules provided for by the Applicable Personal Data Law, maintain Personal Data confidentiality, take necessary measures meant to ensure discharge of the obligations provided for by the Applicable Personal Data Law;
* if the personal data subject withdraws consent to Personal data processing, the Organization shall have the right to continue processing Personal Data without the personal data subject’s consent, if there are grounds specified in the Applicable Personal Data Law.
	1. The Organization shall:
* ensure Personal Data processing in accordance with the Applicable Personal Data Law;
* respond to appeals and requests from personal data subjects and their legal representatives in accordance with the Applicable Personal Data Law;
* provide the authorized body responsible for protecting the rights of personal data subjects (Federal Service for Supervision of Communications, Information Technology and Mass Media (Roskomnadzor) at the request of this body with necessary information within 30 (thirty) days from the date of receiving such a request, unless another procedure is established by the Applicable Law;
* explain to the personal data subject the legal consequences of a refusal to provide their Personal Data and (or) consent to their processing, if, in accordance with the Applicable Personal Data Law, provision of Personal Data and (or) obtaining a consent to personal data processing by the Organization are mandatory;
* take measures necessary and sufficient to ensure discharge of the obligations established by the Applicable Personal Data Law and the regulations adopted in accordance with it. The Organization may independently determine the composition and list of measures necessary and sufficient to ensure discharge of the obligations established by the Applicable Personal Data Law and the regulations adopted in accordance with it, unless otherwise provided for by the Applicable Law;
* in the manner determined by the federal executive body dealing with security – ensure interaction with the state system of detecting, preventing and eliminating the consequences of computer attacks on the information resources of the Russian Federation, including provision it with information on computer incidents that resulted in an illegal transfer (provision, distribution, access) of Personal Data.
	1. The User being a personal data subject shall have the right to:
* access information concerned with processing of their Personal Data, the right to submit a written request for information, except as provided by the Applicable Law. Data shall be provided to the personal data subject by the Organization in an accessible form, and they shall not contain Personal Data relating to other personal data subjects, unless there are legal grounds for disclosing such Personal Data. The list of information and the procedure of obtaining it shall be established by the Applicable Personal Data Law;
* require the Organization to clarify their Personal Data, block or destroy them if the Personal Data are incomplete, outdated, inaccurate, obtained illegally or not necessary for the declared purpose of processing, as well as take measures provided for by the Applicable Law to protect their rights;
* require the Organization to delete specific Personal Data (“the right to be forgotten”);
* require the Organization to restrict processing: the right to request the use of Personal Data only for specific limited purposes;
* opt out promotional newsletters;
* transfer to the personal data subject or a third party the Personal Data that were provided to the Organization by the personal data subject in a machine-readable format;
* withdraw any consent that was previously given by the personal data subject to processing their Personal Data. If the personal data subject withdraws their consent, this shall not affect the legality of using their Personal Data by the Organization until their consent is withdrawn;
* set forth a condition of a prior consent during Personal Data processing to promote goods, work and services in the market;
* appeal, in accordance with the procedure established by the Applicable Personal Data Law, against Organization’s illegal actions or omissions during processing of their Personal Data.
	1. The Organization and the User shall also have other rights and bear other obligations in accordance with the Applicable Personal Data Law.
	2. In exceptional cases, in order to comply with the Applicable Law, ensure public/national security, in connection with criminal/civil proceedings, these rights of personal data subjects may be limited.
1. User’s Personal Data that the Organization May Collect and Process in Connection with Using the Website by Users
	1. The Policy shall apply to all information on the User that the Organization may receive during registration (application submission) on the Website and when the User uses the Website via any device and communicates with the Website in any form, in accordance with this Policy, including:
* personal information voluntarily provided by the User during registration (application submission) as a User. To participate in the Contest during the application process, the following Personal Data of the User shall be considered mandatory: last name, first name and patronymic (if applicable); place of work; registration address; phone number; email; brief information; photo. To participate in the Contest activities (accreditation) during the application process, the following Personal Data of the User shall be considered mandatory: last name, first name and patronymic (if any); place of work; job title; phone number; email; list of equipment (if any);
* personal information that is automatically transferred to the Organization when the User uses the Website with the software installed on the User’s device, including IP address, Cookie information, information on the User’s browser (or another program used to access the Website), access time, requested page address, web analysis tools, etc.
1. User Data Collection and/or Processing Purposes
	1. The Organization shall collect and process the information provided by the Users for the following information (including Personal Data) processing purposes:
* ensure Website functioning and identify the person who uses the Website as a User;
* identify the person using the Website as a User, including identification of Contest participants, determination of the Contest winners, delivery and (or) issuance of prizes, sending information on the Contest in the current year and in subsequent years;
* processing is necessary for the User to exercise rights and discharge obligations during the Contest, provide Users with an expanded access to specific sections of the Website;
* communicate with the User, including sending notifications, requests and information concerned with the Contest and/or Website use (including opening applications, extending deadlines, announcing Contest winners, etc.), processing User’s requests and applications by the Organization;
* ensure Website provision, management and development, improve Website quality, ensure its ease of use, develop new services of the Website, provide the User with custom-tailored Website services;
* perform statistical and other studies based on depersonalized data;
* provide technical support to the User;
* send Users informational materials about the Website or those concerned with it to their email and/or mobile phone number, as well as messages of a different informational nature.
1. Conditions of User Personal Data Processing and Their
Transfer to Third Parties
	1. The Organization shall have the right to collect, record, systematize, store, modify, combine, group, depersonalize, delete, update, extract, transfer (provide), block, destroy User personal data with the help of automation tools, including in information and telecommunication networks, or without the use of such tools, if User personal data processing without such tools corresponds to the nature of the actions (operations) performed with personal data using automation tools, i.e. it allows, in accordance with a given algorithm, searching for personal data recorded on a physical medium and contained in card files or other structured collections of personal data, and/or an access to such personal data.
	2. User information, including User personal data, may be transferred to third parties, including Organization’s partners, solely for the purposes of use specified in the Policy, while the Organization shall require the recipients to comply with the Federal Law “On personal data.”
	3. No cross-border transfer of Personal Data shall be allowed.
	4. The User’s consent with the Policy expressed in registration on the Website by filling in and sending an application for participation in the Contest and/or an application for participation in the Contest activities (accreditation) in an appropriate form, or another statement, or a way of behavior that clearly indicates that the User being a personal data subject in the specified context agrees to processing of their Personal Data, followed by submission of such information by the User and its further use shall mean User’s consent to this transfer.
	5. By participating in the Contest and submitting an application form, the User shall agree that their name, photo and other types of personal information provided may be published on the Website.

Keeping silence, an already ticked box or inaction of the personal data subject shall not constitute consent.

Personal data may be processed in the following ways:

* non-automated processing;
* automated processing;
* mixed processing.
	1. The Personal Data will be stored and processed in the Russian Federation. The Organization will be storing User’s Personal Data for as long as necessary to achieve the purpose for which they were collected or to comply with the Applicable Law and regulations.

The Organization shall store documents in accordance with the Applicable Law.

The Organization shall calculate the terms of storing User Personal Data based on the following criteria:

* duration of the time period necessary to achieve the purposes that were the basis for collecting such data;
* length of the time period for which it is expedient to store the documents to demonstrate that the Organization has discharged its obligations;
* any statute of limitations during which claims may be made;
* any storage periods provided for by the Applicable Law.
	1. The Organization may share Personal Data with third parties only if there are legal grounds for that. The specified persons shall not be allowed to disclose or use the Personal Data provided to them by the Organization for any other purposes, except the purposes expressly provided for by the legal basis of the relevant interaction.

The information obtained during Personal Data processing may be transferred via the internal network of the Organization, as well as via the Internet public domain network.

1. Measures Taken to Protect User
Personal Information
	1. When processing Personal Data, the Organization shall take all necessary organizational and technical measures to protect User Personal Data from unauthorized or accidental access to them, Personal Data destruction, modification, blocking, copying, provision, distribution, as well as other illegal actions in relation to Personal Data. In order to implement these measures to protect Personal Data, the Organization shall determine threats to Personal Data security during their processing, apply information security tools that have passed a conformity assessment procedure. In cases where the use of such tools is necessary to neutralize the current threats to Personal Data security, it shall establish the rules of access to User Personal Data and exercise strict control over all measures taken to ensure Personal Data security and the level of security for personal data information systems.
	2. In case of establishing an illegal or accidental transfer (provision, distribution, access) of Personal Data that caused a violation of personal data subjects’ rights, the Organization shall notify the authorized body responsible for protection of personal data subjects’ rights from the moment such an incident is identified by the Organization, the authorized body responsible for protection of personal data subjects’ rights or other interested persons:
* within twenty-four hours of the incident, of the alleged causes that led to the violation of personal data subjects’ rights, and the alleged harm caused to the personal data subjects’ rights, of the measures taken to eliminate the consequences of the corresponding incident, and provide information on the person authorized by the operator to interact with the authorized body responsible for protection of personal data subjects’ rights on issues concerned with the identified incident;
* within seventy-two hours on the results of the internal investigation of the identified incident, as well as provide information on the persons whose actions caused the identified incident (if any).
	1. The Organization will take all necessary steps to ensure reliable User data processing in accordance with the Policy.
1. Tracking and Cookies Data
	1. The Organization shall use cookies and similar technologies to store specific information.

Cookies shall be files with a small amount of data that may include an anonymous unique identifier. Cookies shall be stored on the User’s device. Other tracking technologies used shall be beacons, tags and scripts to collect and track information and to improve and analyze the Website.

Examples of cookies used by the Organization:

* Session Cookies used to manage the Website;
* Preference Cookies used to remember User’s preferences and various settings;
* Security Cookies used for security purposes.
	1. When the Website is accessed for the first time, a User’s consent to the use of cookies may be requested. If the User approves the use of cookies and then wants to change their mind: The User will be able to do this by deleting the cookies stored in their browser (usually this can be done in the browser settings). After that, a pop-up window may be displayed again to ask for the User’s consent, and the User can make a different choice. If the User rejects the use of cookies, this may result in a situation when some features of the Website become unavailable to the User and the User’s ability to use the Website will be affected. The User may also change their browser settings to accept or reject all cookies or cookies from specific websites by default.

Use the following links to learn how to manage cookies in popular browsers:

Google Chrome: <https://support.google.com/accounts/answer/61416?co=GENIE.Platform%3DDesktop&hl=en>;

Microsoft Edge: <https://support.microsoft.com/ru-ru/help/4468242/microsoft-edge-browsing-data-and-privacy>;

Mozilla Firefox: <https://support.mozilla.org/en-US/kb/enhanced-tracking-protection-firefox-desktop?redirectlocale=en-US&redirectslug=enable-and-disable-cookies-website-preferences>;

Microsoft Internet Explorer: <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies>;

Opera: <https://help.opera.com/ru/latest/web-preferences/>;

Apple Safari: <https://support.apple.com/en-gb/guide/safari/sfri11471/mac>.

To find information on other browsers, visit the websites of the developers of these browsers.

1. Personal Data Updating, Correction, Deletion and Destruction, Responding to Subjects’ Requests for Access to Personal Data
	1. A confirmation of the fact of personal data processing by the Organization, legal grounds and purposes of personal data processing, as well as other types of information specified in part 7, article 14 of the Federal Law “On personal data” shall be provided by the Organization to the User being a personal data subject or their representative during an appeal or upon receiving a request from a personal data subject or their representative. A response to the request shall be provided in the manner and within the deadlines established by article 14 of the Federal Law “On personal data.”

The information to be provided shall not include Personal Data relating to other personal data subjects, unless there are legal grounds for disclosing such Personal Data.

* 1. A request shall contain:
* number of the main identification document of the personal data subject or their representative, information on the date of issuing this document and the authority that issued it;
* information confirming personal data subject’s participation in relations with the Organization (the fact of registration (application submission) on the Website and (or) other types of information), or information otherwise confirming the fact of processing Personal Data by the Organization;
* signature of the personal data subject or their representative.

A request may be sent electronically and signed with an electronic signature in accordance with the Russian legislation.

* 1. If a personal data subject’s appeal (request) does not reflect all the information necessary in accordance with the Federal Law “On personal data” or the subject does not have the right to access the requested information, then a reasoned refusal shall be sent to them.
	2. The personal data subject’s right to access their Personal Data may be limited in accordance with part 8, article 14 of the Federal Law “On personal data,” including if the personal data subject’s access to their personal data violates the rights and legitimate interests of third parties.
	3. If inaccurate Personal Data are detected when a personal data subject or their representative sends an appeal or at their request or at the request of Roskomnadzor, the Organization shall block Personal Data relating to this personal data subject from the moment of such an appeal or the receipt of this request for the period of verification, if Personal Data blocking does not violate the rights and legitimate interests of the personal data subject or third parties.

If the fact of Personal Data inaccuracy is confirmed, the Organization, based on the information provided by the personal data subject or their representative or Roskomnadzor, or other necessary documents shall clarify Personal Data within 7 (seven) business days from the date of provision of such information and unblock the Personal Data.

* 1. If illegal processing of Personal Data is detected when a personal data subject or their representative or Roskomnadzor sends an appeal (request), the Organization shall block the illegally processed Personal Data relating to this personal data subject from the moment of such an appeal or the moment when the request was received.
	2. If a personal data subject withdraws consent to their processing, these Personal Data shall be destroyed.
	3. If a personal data subject applies to the Organization with a request to stop processing their Personal Data, the Organization shall, within no more than 10 (ten) business days from the day when the Organization receives such a request, stop processing them or ensure the termination of such processing (if such processing is performed by the person processing personal data), except the cases provided for in clauses 2-11, part 1 of article 6, part 2 of article 10 and part 2 of article 11 of the Federal Law “On personal data.” This period may be extended, but by no more than 5 (five) business days if the Organization sends a reasoned notification to the personal data subject indicating the reasons for extending the period for providing the requested information.
1. Policy Amendment
	1. The Organization shall have the right to amend and/or supplement the Policy from time to time without a prior written notification of Users by publishing the new version of this Policy on the Website.
	2. Users should familiarize themselves with the Policy at least once a month to find out about any amendments and/or addenda made to it. If the User continues to use the Website under the new conditions, it shall mean that the User automatically confirms their agreement with the new version of the Policy with their actions.
2. Other Provisions
	1. The User shall be responsible for the completeness and accuracy of the data provided. If the data provided by the User are inconsistent and/or incorrect, they may be changed by the User with the help of specific tools found on the Website.
	2. The Policy shall apply only to the Website. The Organization shall not control and shall not be responsible for third parties’ websites or applications that the User can access using the links available on the Website or those posted on the Website pages, including the User information processed by third parties.
	3. The Organization shall not check the accuracy of the personal information provided by Users and shall not control their legal capacity. However, the Organization shall assume that the User provides reliable and sufficient personal information and keeps this information up to date.
3. Contacts
	1. If the User has any questions concerned with the Policy or processing and use of User data in connection with the use of the Website, the User may contact the Organization via email: data.protection@rttv.ru. A User’s request shall include User first name, last name, contact details for communication, as well as other types of information necessary for a comprehensive and complete consideration of the User’s request.