

PROTECTION OF PERSONAL DATA IN THE RUSSIAN FEDERATION



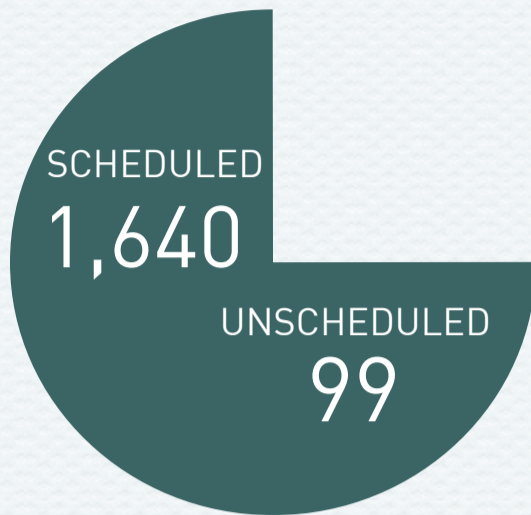
ROSKOMNADZOR*

The state regulator in the field of personal data (hereinafter "PD") which monitors compliance with the relevant law

From year to year, individuals apply to Roskomnadzor more frequently for protection of their rights and legal interests

* Federal Service for Supervision of Communications, Information Technology and Mass Media

2016: INSPECTIONS



619 remedial action orders

2016: ROUTINE MONITORING



647 violations

NUMBER OF COMPLAINTS FROM INDIVIDUALS & LEGAL ENTITIES TO ROSKOMNADZOR

2014



20,132 complaints

2015



33,327 complaints

2016



33,814 complaints

TYPICAL COMPLAINTS

Collection, processing, transfer and distribution of Personal Data, WITHOUT consent of an individual

Creation of FAKE user accounts

Processing of Personal Data for purposes OTHER THAN THE PURPOSE of their initial collection

ABSENCE of a Data Protection Policy on a web site

LIABILITY FOR VIOLATION



Processing of PD inconsistent with the purpose of the data collection or not provided by law

Processing of PD without written consent or with violation of requirements for content of data included in the consent

Failure to publish or provide unrestricted access to the document determining an operator's PD policy

Failure to provide to a PD subject information related to their PD processing

Failure to meet a request of a PD subject to clarify, block or destroy their PD

Failure to perform conditions ensuring safety of PD during processing without automated means if this results in illegal actions in respect to PD

For officials

For legal entities

5,000 - 10,000 RUB 30,000 - 50,000 RUB

10,000 - 20,000 RUB 15,000 - 75,000 RUB

3,000 - 6,000 RUB 15,000 - 30,000 RUB

4,000 - 6,000 RUB 20,000 - 40,000 RUB

4,000 - 10,000 RUB 25,000 - 45,000 RUB

4,000 - 10,000 RUB 25,000 - 50,000 RUB

Review of company's activities for compliance with PD legislation requirements

Development of internal company documents related to PD processing

Advising on issues of PD processing using web sites and mobile apps

Support of companies during interaction with Roskomnadzor, including inspections and filing notifications on PD processing

OUR SERVICES

Analysis and development of recommendations on issues related to cross-border transmission of PD



Support with document management and storage (including HR, financial and accounting documents); development of a Document Storage Plan

Advising on legal issues related to cryptographic data protection

Leading global manufacturer of roof windows

North American Manufacturer of Dietary Supplements

Leading global provider of solutions for packing materials for pharmaceutical and cosmetic products

OUR CLIENTS

Major pharmaceutical company

Major foreign software developer

Major foreign garment manufacturer

CONTACTS

Dmitry Churin
Principal Associate of
Corporate practice
dchurin@cls.ru

Vadim Kovalyov
Associate of
Corporate practice
vkovalyov@cls.ru

cls@cls.ru
www.cls.ru



1Sadovaya Plaza Business
Center
7 Dolgorukovskaya Street
127006 Moscow, Russia
Tel.: + 7 495 970-1090
Fax: + 7 495 970-1091



Office Center "Passage /
Italianskaya 17"
17 Italienskaya Street
191186 St. Petersburg, Russia
Tel.: +7 812 346-7990
Fax: +7 812 346-7991



Mannerheimintie
16 A 4 Fin - 00100,
Helsinki
Тел.: +358 (0) 20 73 46490