

DATA PROTECTION GUIDELINES

Autonomous Non-Profit Organization for Science and Culture The Finnish Institute in St. Petersburg

1. GENERAL PROVISIONS

- 1.1.** The Data Protection Guidelines (hereinafter referred to as the "Guidelines") establish the procedures for processing, protection and storage of personal data of individuals, implemented by Autonomous Non-Profit Organization for Science and Culture "The Finnish Institute in St. Petersburg" (TIN 7825470521) (hereinafter referred to as the "Finnish Institute") using automation tools, without the use of automation tools and/or in case of combined use of the above methods, when using the information and telecommunications network "Internet," including instfin.ru website (including all levels of the specified domain).
- 1.2.** These Guidelines were developed in accordance with Federal Law No. 149-FZ dd July 27, 2006 "On Information, Information Technologies and the Protection of Information," Federal LawNo. 152-FZ dd July 27, 2006 "On Personal Data" and Federal LawNo. 38-FZ dd March 13, 2006 "On Advertising."

2. TERMS AND DEFINITIONS

- 2.1.** Capitalized terms used in the Guidelines have the following meanings:
 - 2.1.1.** Automated personal data processing shall mean Processing of Personal Data using computer aids;
 - 2.1.2.** Blocking of personal data shall mean suspension of the Personal Data Processing (except for cases when processing is necessary to clarify personal data);
 - 2.1.3.** Information shall mean any data (messages, data), regardless of the form and method of their provision;
 - 2.1.4.** Personal data information system shall mean a set of Personal Data contained in databases and information technologies and technical means ensuring their Processing;
 - 2.1.5.** The Finnish Institute shall mean the Autonomous Non-Profit Organization for Science and Culture "The Finnish Institute in St. Petersburg" (Principal State Registration Number (OGRN) 1037843106784, Taxpayer Identification Number (INN) 7825470521, located at: Letter A, 4-6-8 Bolshaya Konyushennaya Ulitsa, Saint Petersburg, 191186);
 - 2.1.6.** Confidentiality of personal data is the duty of the Person who has access to Personal Data or the Person who processes personal data not to disclose them to third parties and not to allow their circulation without the consent of the Personal Data Owner or without other legitimate grounds;
 - 2.1.7.** Cookies shall mean the small text files (usually consisting of letters and numbers) stored in the memory of the Web browser or the website user device, when the site User uses the Website;
 - 2.1.8.** Persons who have access to the personal data shall mean the persons who have received access to the Personal Data;
 - 2.1.9.** A person that processes personal data shall mean a third party that on behalf of and for the benefit of the Personal Data Controller carries out Processing of Personal Data for the purposes and using methods established by the Personal Data Controller, based on an agreement or other transaction;
 - 2.1.10.** Anonymization of personal data shall mean actions (operations) aimed at Personal Data Processing performed both using the automation tools and without the use of such tools, as a result of which it is impossible to determine the fact of Personal Data belonging to a specific Personal Data Owner without obtaining additional information;
 - 2.1.11.** Personal Data Processing(Processing) shall mean any action (operation) or a set of actions (operations) performed with Personal Data both using the automation tools and without the use of such tools, including collection, recording, systematization, accumulation, storage, clarification (update, modification), extraction, use, transfer (distribution, provision, access), anonymization, blocking, deletion, destruction of Personal Data;
 - 2.1.12.** Publicly available personal data shall mean the Personal Data, access to which was provided to an unlimited number of persons by the Personal Data Owner itself or with its consent;
 - 2.1.13.** Personal Data Controller shall mean an entity that either independently or jointly with other entities arranges for and/or performs Personal Data Processing and determines the purposes of Personal Data Processing, the structure of the Personal Data to Be Processed, and the actions (operations) taken with the Personal Data. For the purposes hereof, the Finnish Institute shall be deemed to be the Personal Data Controller;
 - 2.1.14.** Personal Data shall mean any information relating directly or indirectly to a specific or identifiable individual (Personal Data Owner); the Personal Data obtained by the Finnish Institute may be stored in a hard copy and/or in electronic form;
 - 2.1.15.** Website user shall mean an individual that using computer software receives access to the Website;

- 2.1.16.** Provision of personal data shall mean actions (operations) aimed at disclosing Personal Data to a specific person or a certain number of persons;
- 2.1.17.** Distribution of personal data shall mean actions (operations) aimed at disclosing Personal Data to an undetermined number of persons;
- 2.1.18.** Website shall mean a website in the information and telecommunications network "Internet" at the address: instfin.ru (including all levels of the specified domain, which both function as of the date of adoption of these Guidelines and launched and put into operation during its period of its validity). The website has a physical form, which is a set of data and commands intended for interaction of the Finnish Institute and the Personal Data Owners for the purpose of information exchange, including but not limited to, establishing business and partnership relations, for the purpose of information exchange, organization of marketing and advertising activities;
- 2.1.19.** Personal Data Owner is an individual in relation to which Personal Data Processing is carried out. These Guidelines regulate Processing of Personal Data taking into account the purpose of their Processing. Within the framework of these Guidelines, the Personal Data Owner shall mean the Website User and the person that provides Personal Data to the Finnish Institute, including through the use of the Website, to meet the purposes established by the Guidelines;
- 2.1.20.** Cross-border transfer of personal data shall mean the transfer of Personal Data to the territory of a foreign state, to the authority of a foreign state, a foreign individual or a foreign legal entity;
- 2.1.21.** Destruction of personal data shall mean actions (operations) as a result of which it becomes impossible to restore the contents of personal data in the Personal Data Information System and/or as a result of which Personal Data physical media are destroyed.

3. GOALS AND PRINCIPLES OF THE GUIDELINES

3.1. These Guidelines are introduced in order to:

- Protect the rights and freedoms of the Personal Data Owners when Processing their Personal Data, including personal privacy, personal and family secret protection rights, when using automation tools in the information and telecommunications network "Internet," and/or in case of combined use of the automation tools and without the use of the automation tools;
- Streamlining the process of Personal Data Processing, their protection from unlawful actions therewith and loss thereof;
- Informing the Personal Data Owner about the Personal Data Processing procedure when interacting with the Finnish Institute using the Website.

3.2. When Processing Personal Data, the Finnish Institute shall be guided by the following basic principles:

3.2.1. Processing of the Personal Data shall be arranged:

- On the legitimate and equitable basis (the Finnish Institute during processing of any personal data shall be guided by the applicable Russian laws, European laws and principles of morality and ethics);
- Only with the consent (direct expression of will; implied consent, etc.) of the Personal Data Owner for Personal Data Processing;
- Only for the purpose of achievement of the specific predetermined goals, which are set forth in Section 5 of these Guidelines, and provided that the content, volume and type of the processed Personal Data correspond to the stated Processing purposes;
- Processing of Personal Data using methods not specified in these Guidelines is prohibited.
- Combination of databases containing Personal Data, the Processing of which is carried out to achieve the goals incompatible with each other is prohibited;
- The Finnish Institute ensures the accuracy, sufficiency, and, if necessary, the relevance of the Processed Personal Data received through the Website;
- Personal data shall be destroyed or depersonalized upon achievement of their Processing goals and if it is no longer relevant to achieve their Processing goals, or in case of detection of incompleteness / inaccuracy of Personal Data;
- Personal Data shall be stored in the form that makes it possible to identify the Personal Data Owner during the period of time not longer than required by such data Processing goals, or in cases provided for by the applicable law of the Russian Federation.

4. PERSONAL DATA CATEGORY

- 4.1. The Finnish Institute uses the Website to Process the Personal Data of the Personal Data Owners. Simultaneously, the Website collects such information as: Information about the Website User's browser (or other program with which the Website is accessed, the technical characteristics of the hardware and software used by the Website User, the date and time of access to the services, the addresses of the requested pages and other similar Information).
- 4.2. The Website User submits to the Finnish Institute the following Personal Data at its own discretion:
 - Surname, name, patronymic;
 - Telephone numbers (mobile and land line) if they are registered as owned by the specified Personal Data Owner or at the address of its registration;
 - E-mail address;
 - Other information which the Finnish Institute plans to study.
- 4.3. Personal data in the amount specified in Clause 4.2, are submitted by the Personal Data Owner directly. In the event that Personal Data are transferred by a third party, the Finnish Institute has the right to request from the third party Information about the legal basis for transfer of Personal Data.
- 4.4. Personal data specified in Clause 4.2 shall be deemed to be reliable until their reliability is refuted by any legal means.
- 4.5. If the Information provided by the Personal Data Owner does not make it possible to identify, directly or indirectly, the person, as well as the Personal Data Owner, the specified Guidelines shall not be applied.
- 4.6. The Website uses the following Cookies:
 - 4.6.1. Necessary cookies: they are aimed at a convenient use of the Website and make it possible to use basic functions of the Website, such as page navigation and access to secure sections of the Website. The Website cannot function properly without the specified Cookies. Necessary Cookies collect Information in the amount that does not make it possible to classify the above Information as Personal Data. The above Cookies are mandatory and may not be disabled by the Website User without prejudice to the functioning of the Website (correctness of page demonstration and Website content);
 - 4.6.2. Preferences cookies: they determine the preferred language of the Website User and allow the Website to set the preferred language at a time of the repeated access (login);
 - 4.6.3. Statistics cookies: they help the Finnish Institute to understand how the Website Users interact with it. Statistics cookies collect and submit Information about the Website behavior patterns.
- 4.7. The Website uses third-party services to measure the Website traffic and analyze the behavior of the Website Users, namely Google Analytics.
- 4.8. The Website Users have the possibility to disable Cookies specified in Clauses 4.6.2., 4.6.3.

5. OBJECTIVES OF PERSONAL DATA PROCESSING

- 5.1. The Website Users' Personal Data are processed to achieve the following objectives:
 - Informing the Personal Data Owner about events, exhibitions, etc. held by the Finnish Institute or partners of the Finnish Institute by sending personalized or non-personalized messages, advertising and marketing materials to the e-mail of the Personal Data Owner;
 - Drawing attention to the activities of the Finnish Institute or its partners, including by sending information and messages of marketing/advertising nature to the e-mail address of the Personal Data Owner; and/or
 - Receiving feedback, questions, letters, claims and recommendations (requests) regarding the activities of the Finnish Institute from the Personal Data Owner, as well as a response to the above requests;
 - Getting feedback from the Website User, including sending notices, requests regarding the use of the Website, processing requests from the Website User.

6. CONSENT TO PERSONAL DATA PROCESSING

- 6.1. Processing of Personal Data is only possible provided there is a consent of the Personal Data Owner (hereinafter – "Consent"). The consent shall be given by the Personal Data Owner on its own free will and in pursuance of its own benefit. It shall be specific and informed and provided/given in any form that makes it possible to confirm the fact of its obtaining, including:
 - providing/sending Personal Data using a special form given on the Website;
 - providing/sending Personal Data to the Finnish Institute using the contact information published on the Website;
 - putting a mark in the appropriate line on the Website.

Commission of actions specified above by the Personal Data Owner shall be recognized as giving Consent to the Personal Data processing for the purposes specified in these Guidelines and shall also acknowledge the fact of familiarization with these Guidelines.

- 6.2.** The term of the Consent commences on the start date of its validity (the time of giving Consent by the Personal Data Owner) and expires at the time of withdrawal of the Consent by the Personal Data Owner in the ways specified in these Guidelines.
- 6.3.** In case of obtaining Consent from a third party (a representative of the Personal Data Owner), the Finnish Institute shall verify the authority of this representative to give such Consent.
- 6.4.** The Personal Data Owner shall have the right at any time to withdraw its Consent by notifying the Finnish Institute about it, by sending a notice to the address: Letter A, Bolshaya Konyushennaya Ulitsa 4-6-8, Saint Petersburg, or an e-mail to the Finnish Institute's e-mail info@instfin.ru.
- 6.5.** Commission of actions by the Personal Data Owner on provision of Personal Data to the Finnish Institute shall also be recognized as the consent of the Personal Data Owner to receive information or advertising letters by e-mail from the Finnish Institute in accordance with Section 5 of these Guidelines. The Personal Data Owner shall have the right to refuse to receive these letters at any time, as well as withdraw its Consent – as established by Clause 6.4. of these Guidelines.
- 6.6.** The Website provides for the possibility of the Personal Data Owners sending feedback, questions, inquiries, claims and recommendations regarding the activities of the Finnish Institute by using the contact information published on the Website.
- 6.7.** In order to obtain the informed Consent of the Personal Data Owners, the Website also contains a link to these Guidelines for familiarization with it, as well as a separate line in which the Personal Data Owner may put a mark on giving its Consent. The fact of putting the relevant mark shall be recognized as giving Consent by the Personal Data Owner to processing of the Personal Data submitted by the Personal Data Owner for the purposes and in all ways provided for in Sections 5 and 10 of these Guidelines.
- 6.8.** Withdrawal of Consent by the Personal Data Owner in the manner prescribed by Clause 6.4. of these Guidelines shall mean that the Finnish Institute is not entitled to process its Personal Data since the time of receipt of the corresponding refusal or withdrawal of the Consent.
- 6.9.** If the Personal Data Owner has made its Personal Data publicly available (Publicly Available Personal Data) by posting Personal Data on the Internet, then the Finnish Institute shall not be obliged to obtain its Consent.

7. RIGHTS AND OBLIGATIONS OF THE PERSONAL DATA OWNER

7.1. The Personal Data owner shall have the right to:

- 7.1.1.** Send requests to the Finnish Institute independently or through a third party (authorized representative) and, based on the above request, receive full information on the list and conditions of processing of its Personal Data by the Finnish Institute, no more than once a month.

The request specified in this Clause shall have:

- information that makes it possible to identify the Personal Data Owner or its representative;
- data indicating the fact of the Processing of Personal Data by the Controller, the signature of the Personal Data Owner or its representative.

- 7.1.1.1.** The data that are transmitted as part of the above request shall be stored for 1 (one) month in order to control the number of requests on the subject specified in this Clause, and shall be destroyed upon expiration of 1 (one) month.
- 7.1.1.2.** If the Controller, within 3 (three) business days after receiving the specified request, establishes that the data specified in the request are not reliable, inter alia, do not make it possible to establish the fact of the Controller's processing of the Personal Data specified in the request, the Controller shall destroy the data received by it as part of the request, and notify the person that had sent the information request as set forth in this Clause, of the impossibility to establish the existence of a relationship on the Processing of Personal Data between the Controller and the Personal Data Owner.
- 7.1.1.3.** A response to a request for provision of full information regarding the list and conditions for Processing of Personal Data and/or a notice of the impossibility of establishing the existence of a relationship on the Processing of Personal Data between the Controller and the Personal Data Owner shall be sent using the means of communication with which the request was sent to the Finnish Institute.
- 7.1.2.** Ask the Finnish Institute to rectify, block or destroy its Personal Data in the event that they are incomplete, outdated, inaccurate, illegally obtained or not necessary for the stated Personal Data Processing purpose;

- 7.1.3.** Ask the Finnish Institute to notify all persons who have previously been provided with incomplete, outdated or inaccurate Personal Data about all rectifications made therein, if such actions affect the execution of transactions, obligations under the applicable Russian law;
- 7.2.** The Personal Data Owner shall:
 - 7.2.1.** Provide the Finnish Institute with reliable Personal Data, as well as Personal Data owned by the Personal Data Owner;
 - 7.2.2.** Timely inform the Finnish Institute of changes (rectify and supplement) its Personal Data.

8. RIGHTS AND OBLIGATIONS OF THE CONTROLLER

- 8.1.** The Finnish Institute shall:
 - 8.1.1.** Bring these Guidelines to the attention of the Personal Data Owner by posting them on the Website (unlimited access to these Guidelines);
 - 8.1.2.** Process Personal Data only subject to availability of the Consent provided by the Personal Data Owner, which may be also provided in electronic form;
 - 8.1.3.** Upon receipt of a withdrawal of the Consent from the Personal Data Owner, the Finnish Institute shall cease the processing of its Personal Data and/or, if their storage is no longer required for the purposes of processing, shall destroy such Personal Data within 30 (thirty) days from the date of receipt of such a withdrawal;
 - 8.1.4.** Explain to the Personal Data Owner the legal consequences of its refusal to give Consent;
 - 8.1.5.** The Finnish Institute shall collect all Personal Data directly from the Personal Data Owner or from an authorized representative of the Personal Data Owner. As part of the Website functioning, the provided Personal Data shall be recognized as transferred personally by the Personal Data Owner or by an authorized representative of the Personal Data Owner;
 - 8.1.6.** The Finnish Institute shall have no right to process Personal Data on the race, nationality, political views, religious or philosophical beliefs, biometric Personal Data, data on the state of health, intimate life of the Personal Data Owner, unless the processing of such Personal Data is necessary to achieve a goal of such processing and taking into account the form of the Consent established by the Law on Personal Data;
 - 8.1.7.** When collecting Personal Data of the Personal Data Owners who are citizens of Russia, ensure the recording, systematization, accumulation, storage, rectification (updating, modification), extraction of Personal Data using databases located in Russia;
 - 8.1.8.** Upon receipt of the information from the Personal Data Owner confirming that the Personal Data that have been previously submitted to the Finnish Institute, are incomplete, irrelevant or illegally obtained, the Finnish Institute, within 7 (seven) business days shall make changes to such Personal Data, and in the event such Personal Data are illegally obtained, shall destroy them and immediately informs the Personal Data Owner and the third parties to which Personal Data of such Personal Data Owner have been submitted, accordingly;
 - 8.1.9.** If the Finnish Institute or the Personal Data Owner itself identifies inaccurate Personal Data, the Finnish Institute shall immediately cease their Processing and request clarification from the Personal Data Owner on this matter. Upon receipt of the clarifications, the Finnish Institute shall update these Personal Data and resume processing within 7 (seven) business days;
 - 8.1.10.** If the Finnish Institute of the Personal Data Owner itself reveals the fact of unlawful processing of its Personal Data by the Controller, the Finnish Institute shall immediately block their Processing and cease their Processing within 3 (three) business days, or, when such cease of processing is impossible, destroy such Personal Data and inform the Personal Data Owner accordingly;
 - 8.1.11.** Monitor the activities of the entity that processes Personal Data, taking into account the requirements of the Law on Personal Data, civil transactions. In the event of a violation of obligations by the Personal Data Processor, the Finnish Institute, from the time such a violation is discovered, shall send a request for termination of illegal actions in relation to Personal Data and inform the Personal Data Owners of such violation;
 - 8.1.12.** At a time of entering into an agreement with the Personal Data Processor, establish an obligation to keep Personal Data Confidential, and the procedure of Personal Data Processing, and establish the liability for violation of this obligation by the Personal Data Processor.
- 8.2.** The Finnish Institute shall have the right to:
 - 8.2.1.** Subject to the requirements of the Law on Personal Data, process Personal Data in accordance with the purposes of the stated processing;
 - 8.2.2.** Transfer Personal Data to the territory of countries that provide adequate protection of Personal Data - as established by the Russian law;

- 8.2.3.** Transfer Personal Data to the territory of countries that do not provide adequate protection of Personal Data only with the Consent of the Personal Data Owner;
- 8.2.4.** Provide Personal Data to the Personal Data Processor, as well as to the person who has access to Personal Data, including for the purpose of fulfilling the obligation to the Personal Data Owner as set forth in section 5 of these Guidelines, in particular IT Service LLC (OGRN: 1167746349429, INN: 7724359823, address: Room 166, Office 1, Floor 2, 26 Ulitsa Leninskaya Sloboda, 115280 Moscow).
- 8.2.5.** Determine the list of persons who have access to Personal Data, based on expediency and reasonableness.

9. PERSON RESPONSIBLE FOR PERSONAL DATA PROCESSING

- 9.1.** In order to ensure that the Finnish Institute fulfills the obligations stipulated by these Guidelines and the Russian law in the field of Personal Data, the Director shall appoint a person responsible for Processing and storage of Personal Data (hereinafter referred to as the "Responsible Person").
- 9.2.** The Responsible Person shall receive instructions directly from the Director of the Finnish Institute and reports exclusively to the Director.
- 9.3.** The Responsible Person performs, inter alia, the following functions:
 - 9.3.1.** Exercises internal control over the compliance by the Finnish Institute with the law of the Russian Federation on Personal Data, including the requirements for the protection of Personal Data;
 - 9.3.2.** Controls and bears disciplinary liability for the Processing of Personal Data in accordance with the requirements established by these Guidelines and the law of the Russian Federation on Personal Data;
 - 9.3.3.** Controls and provides access to document storage systems and information systems containing Personal Data only to those persons that are authorized to access Personal Data;
 - 9.3.4.** Brings to the attention of Personal Data Owners the contents of these Guidelines and the requirements of the law of the Russian Federation on Personal Data;
 - 9.3.5.** Organizes acceptance and processing of requests and letters sent by the Personal Data Owners or their representatives and monitors the acceptance and processing of such requests and letters;
 - 9.3.6.** Organizes the protection of the Personal Data Information Systems, timely identification and elimination of threats in the operation of these Information Systems, and at least once a calendar year analyzes the protection status of the information systems for compliance with the requirements of these Guidelines and the Russian law;
 - 9.3.7.** When organizing the protection of the Personal Data Information Systems, if necessary, ensures the use of the information security tools that have passed the procedure for assessing compliance with the requirements of the Russian law in the field of information security, in the case when the use of such tools is necessary to eliminate the existing threats to these Information Systems;
 - 9.3.8.** Organizes control and monitors the physical integrity of the Personal Data Information System tools and equipment, as well as hard copies containing Personal Data;
- 9.4.** The Responsible Person shall be responsible for maintenance of the necessary and sufficient level of Personal Data protection and implementation of measures aimed at protection of Personal Data by the Finnish Institute.
- 9.5.** The requirements of the Responsible Person related to fulfillment of the official duties are mandatory for all Persons who have access to Personal Data.

10. METHODS AND GENERAL RULES FOR PERSONAL DATA PROCESSING

- 10.1.** The Finnish Institute processes Personal Data using the following methods:
 - 10.1.1.** With the use of computer aids and automation tools (Automated Processing of Personal Data), and without the use of computer aids and automation tools.
 - 10.1.2.** When Processing Personal Data, the Finnish Institute shall take necessary and sufficient legal, organizational and technical measures to protect the Personal Data against unauthorized or accidental access, destruction, modification, blocking, copying, provision, distribution of Personal Data, as well as from other illegal actions against Personal Data.
- 10.2.** In order to ensure the Personal Data security and fulfillment by the Finnish Institute of obligations set forth in these Guidelines and the applicable Russian law on Personal Data, the Finnish Institute, among other things, shall:
 - 10.3.1.** Appoint a Responsible Person;
 - 10.3.2.** Update these Guidelines and bring it in line with the requirements of the Russian law on Personal Data when amendments are made thereto;
 - 10.3.3.** Identify the threats to the Personal Data security during their Processing;
 - 10.3.4.** Establishes the rules for accessing Personal Data;

- 10.3.5.** Apply organizational and technical measures to ensure the Personal Data security during their processing, i.a., it shall:
- install systems and software that prevent Personal Data from entering the Information System (anti-virus programs, firewalls, etc.);
 - minimize the access rights: access to Personal Data is provided only to the Responsible Person and the Persons who have access to such data and only to the extent necessary to fulfill their relevant duties;
 - reveal the facts of unauthorized access to Personal Data and undertake the necessary measures to prevent such access in the future;
 - organize storage of Personal Data separately from other Information;
 - use separate tangible storage media for non-automated Processing of each category of Personal Data;
 - recover Personal Data modified or destroyed due to unauthorized access to them;
 - ensure individual Processing of Personal Data in case of incompatibility of the purposes of Processing of Personal Data recorded on one tangible storage medium, if the tangible storage medium does not allow Processing Personal Data separately from other Personal Data recorded on the same medium.
- 10.3.6.** Evaluate the efficiency of measures taken to ensure the Personal Data security and conduct an audit of the compliance of the Finnish Institute Personal Data Processing with the requirements of these Guidelines and the Russian law on Personal Data.

11. STORAGE, ACCESS AND DESTRUCTION OF PERSONAL DATA

- 11.1.** Personal Data shall be stored:
- In electronic form on the personal computer of the Director, Persons who have access to Personal Data.
- 11.2.** Persons authorized to access Personal Data and holding the following positions shall have access to the Personal Data:
- Director;
 - A person that has access to Personal Data;
 - Personal Data Processor.
- 11.3.** Persons who have access to Personal Data, when working with Personal Data, undertake an obligation not to disclose such Personal Data and keep such Personal Data confidential.
- 11.4.** The Personal Data shall be stored in the Finnish Institute not longer than is required to meet the objectives of Personal Data Processing.
- 11.5.** Destruction of Personal Data from machine-readable media shall be organized using method that excludes the possibility of using and restoring Personal Data (including destruction of backup copies).

12. FINAL PROVISIONS

- 12.1.** These Guidelines shall come into effect as of the date of their approval by the Director and shall be brought to the attention of each Person that has access to Personal Data.
- 12.2.** Poor awareness of the provisions hereof shall not release from the liability for non-compliance.
- 12.3.** Control over compliance with the provisions hereof is assigned to the Responsible Person appointed by the Director.
- 12.4.** All amendments and addenda hereto, as well as cancellation hereof in view of adoption of the new Guidelines shall be approved by the Director and communicated to all Persons that have access to Personal Data, and shall be also posted on the Website.
- 12.5.** Invalidity or recognition of part of the provisions hereof inconsistent with the Russian laws shall not make other provisions hereof invalid.