

FEDERAL STATE AUTONOMOUS EDUCATIONAL INSTITUTION OF HIGHER
EDUCATION

PETER THE GREAT ST. PETERSBURG POLYTECHNIC UNIVERSITY



**POLICY OF CONFIDENTIALITY OF PERSONAL DATA
PROCESSED ON WEB-SITES OF PETER THE GREAT
ST. PETERSBURG POLYTECHNIC UNIVERSITY**

St. Petersburg

2024

Terms and definitions

Website Administrator is an employee of SPbPU authorized to manage the website, who organizes and (or) carries out the processing of personal data, as well as determines the purposes of personal data processing, the composition of personal data subject to processing, actions (operations) performed with personal data.

Confidentiality of personal data is a requirement mandatory for the operator or any other person who has access to personal data not to allow their dissemination without the consent of the subject of personal data or other legal basis.

Web site of SPbPU is a set of interconnected web pages located on the Internet at the URL <https://www.spbstu.ru/> and its sub-domains.

Personal Data Processing is any action (operation) or set of actions (operations) performed with or without the use of automation means with personal data, including collection, recording, systematization, accumulation, storage, clarification (update, change), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data.

Personal data is any information relating directly or indirectly to a certain or definable natural person (subject of personal data).

Website User (hereinafter referred to as the User) is an individual who has access to the website of SPbPU via the Internet and uses information, materials and products of the website.

User Support Service is a service to which users can contact for technical support in solving a problem and for additional information on the issue of interest (support@spbstu.ru, +7 (812) 775-05-10, <https://it.spbstu.ru>).

Subdomains are pages or a set of pages located on third-level domains belonging to the <https://www.spbstu.ru/> website.

Cookies are a small piece of data sent by a web server and stored on the user's computer, which a web client or web browser sends to the web server in an HTTP request each time it tries to open a page of the respective website.

1. General Provisions

1.1 The Personal Data Confidentiality Policy for Personal Data Processing on the websites of SPbPU (hereinafter - the Policy) is developed in accordance with the requirements of the Federal Law No152-FZ dated 27.07.2006 "On Personal Data" and the Resolution of the Government of the Russian Federation No. 1119 dated 01.11.2012 "On Approval of Requirements for Personal Data Protection in Personal Data Processing in Personal Data Information Systems".

1.2 This Policy defines the procedure for processing personal data and measures to ensure the security of personal data taken by SPbPU.

1.3 The User's use of the website of SPbPU means that the User agrees with this Policy and the terms of processing the User's personal data.

1.4 For the purposes of this Policy, the User's personal data shall mean:

- The User's personal data that he/she provides about himself/herself in the process of using the services of the website of SPbPU (the information required to provide the services is marked in a special way).

- Data that is automatically transmitted to the services of the website of SPbPU in the course of their use by means of the software installed on the User's device, including IP-address, cookie data, information about the User's browser, technical characteristics of equipment and software used by the User, date and time of access to the services, addresses of requested pages, and other similar non-personalized information.

1.5 In case of disagreement with the terms of this Policy, the User shall stop using the website of SPbPU.

1.6 This Policy applies only to the websites of FGAOU HE "SPbPU". SPbPU does not control and is not responsible for third party websites, which the User can access via links available on the website of SPbPU.

1.7. SPbPU does not verify the accuracy of personal data provided by the User.

1.8. Users who have filled in information constituting personal data on the website of SPbPU, as well as who have posted other information by the specified actions confirm their consent to the processing of personal data and their transfer to the personal data processing operator.

2. Purpose of processing Users' personal data

2.1 SPbPU collects and stores only those personal data that are necessary for the provision of services or fulfillment of agreements and contracts with the User, except in cases where the law provides for mandatory storage of personal data for a period of time specified by law.

2.2 In case of receipt of a notice from the User on withdrawal of consent to the processing of personal data, SPbPU stops processing the User's personal data within a period not exceeding 10 business days from the date of receipt.

2.3 Notification of withdrawal of consent to the processing of personal data shall be sent to the e-mail address of the User Support Service (support@spbstu.ru) or in the form of a written request to the following address: 195251, St. Petersburg, the inner terr., Akademicheskoye City Municipal District, 29 Polytechnicheskaya Str., let. B.

2.4 SPbPU processes personal data of Users for the following purposes:

- Concluding, executing and terminating civil law contracts (including a contract for the provision of educational services)
- Providing access to services, information and/or materials contained on the website
- Participating in organized surveys and questionnaires
- Informing the User by sending e-mails.

2.5 Anonymized data about the User's activities on the website, collected with the help of Internet statistics services.

The anonymized data about the User's activities on the website, collected by means of Internet statistics services, serve to optimize the operation of the website.

3. Conditions of processing of personal data of Users and its transfer to third parties

3.1 Processing of personal data is carried out with the User's consent to the processing of his/her personal data.

3.2 SPbPU processes the User's personal data only if it is filled in and/or sent by the User independently via special forms located on the website or sent via e-mail. By filling out the appropriate forms and/or sending their personal data, the User expresses their consent to this Policy.

3.3 SPbPU processes anonymized data about the User if it is allowed in the User's browser settings (cookies and JavaScript technology are enabled).

3.4 The User independently decides whether to provide his/her personal data and gives consent freely, of his/her own free will and in his/her own interest.

3.5 SPbPU stores Users' personal data in accordance with the internal regulations of information systems and services.

3.6 The User's personal data shall be kept confidential, except for cases when the User voluntarily provides information about himself/herself for public access to an unlimited number of persons.

3.7 SPbPU has the right to transfer the User's personal data to third parties in the following cases:

- The User has expressed consent to such actions
- The transfer is necessary for the User to use a certain service or to fulfill a certain agreement with the User
- Transfer is stipulated by Russian legislation within the framework of the procedure established by the legislation.

3.8 Processing of User's personal data is carried out without time limit by the following methods: collection, recording, systematization, accumulation, storage, clarification (update, change), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data, including in personal data information systems with or without the use of automation tools. Processing of personal data of Users is carried out in accordance with the Federal Law of 27.07.2006 No. 152-FZ "On Personal Data".

3.9 In case of loss or disclosure of personal data, SPbPU informs the User of the loss or disclosure of personal data.

3.10. The Website Administrator shall take the necessary organizational and technical measures to protect the User's personal data from unlawful or accidental access, destruction, modification, blocking, copying, distribution, as well as from other unlawful actions of third parties.

4. Responsibilities of the Website Administrator

4.1 The Website Administrator is obliged to:

- Use the information received exclusively for the purposes specified in this Policy.
- Keep confidential information confidential, not to disclose without prior written permission of the User, as well as not to sell, exchange, publish or disclose by other possible means the transferred personal data of the User, except as provided for in this Policy.

- Ensure protection of the User's personal data during their processing, to take the necessary legal, organizational and technical measures against unauthorized, illegal or accidental access to personal data, destruction, modification, blocking, copying, provision, distribution of personal data, as well as against other illegal actions in relation to personal data;
- Block personal data related to the respective User from the moment of the User's application or request, its legal representative or the authorized body for protection of the rights of personal data subjects for the period of verification in case of detection of unreliable personal data or unlawful actions.

5. Responsibility

5.1 The website administrator who fails to fulfill his obligations shall be liable for losses incurred by the User due to unauthorized use of personal data in accordance with the legislation of the Russian Federation.

5.2 In case of loss or disclosure of confidential information, the Website Administrator shall not be liable if this confidential information:

- Became public domain before its loss or disclosure
- Was disclosed with the User's consent.

6. Dispute resolution

6.1 Before filing a claim in court for disputes arising out of the relationship between the User and SPbPU, a claim (a written proposal for voluntary dispute resolution) is mandatory.

6.2 Within 20 calendar days from the date of receipt of the claim, the recipient of the claim shall notify the claimant in writing of the results of the claim review.

6.3 In case of failure to reach an agreement, the dispute will be referred to the court for consideration in accordance with the current legislation of the Russian Federation.

6.4 The current legislation of the Russian Federation shall apply to this Policy and relations between the User and SPbPU.

7. Additional terms and conditions

7.1. SPbPU has the right to make changes to this Policy without the User's consent.

7.2 The updated Policy comes into effect from the moment it is posted on the website, unless otherwise provided by the new version of the Policy.

7.3 Any suggestions or questions regarding this Policy should be sent to the User Support Service at the e-mail address support@spbstu.ru.

7.4. The current Policy is available on the web page at:
https://www.spbstu.ru/upload/personal_data_policy.pdf.

7.5 This Policy is an integral part of the contract of educational services concluded with the User.

