



# Privacy policy

## 1. General provisions

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2. Policy processing of personal data of JSC "Clinic Paramonov" (hereinafter – Policy) defines the principles, purposes, conditions and means of processing personal data, the lists of entities and process in JSC "Clinic Paramonov" personal data, functions, "Clinic of Dr. Paramonov" in the processing of personal data, rights of subjects of personal data, and implemented in "Clinic of Dr. Paramonov" requirements for the protection of personal data.
3. This Policy on the processing of personal data is developed in accordance with part 2 of article 18.1 of the Federal law of 27.07.2006 № 152-FZ "On personal data" and defines the procedure for processing personal data and measures to ensure the security of personal data in "Clinic of Dr. Paramonov" in order to protect the rights and freedoms of man and citizen in the processing of his personal data, including the protection of rights to privacy, personal and family secrets.
4. the Provisions of the Policy serve as the basis for the development of local regulations governing the processing of personal data of employees of "Clinic of Dr. Paramonov" and other subjects of personal data in "Clinic of Dr. Paramonov".
5. The Policy applies to all personal data of subjects processed by "Clinic of Dr. Paramonov" with the use of automation and without the use of such means.
6. This Policy is put into effect by order of the General Director of "Clinic of Dr. Paramonov" or the person performing his duties.

## 2. List of legislative and other regulatory legal acts regulating the processing of personal data in "Clinic of Dr. Paramonov"

1. the Policy of processing of personal data in Clinic of Dr. Paramonov is defined according to the following regulatory legal acts:
  - the Constitution of the Russian Federation of 12.12.1993;
  - the
  - Labor code of the Russian Federation from 30.12.2001 № 197ФЗ;
  - Civil code of the Russian Federation of 30.11.1994 № 51FZ;



- Federal law of 27.07.2006 № 152-FZ "On personal data";
- Federal law of 27.07.2006 № 149-FZ "On information, information technologies and information protection";
- Law of the Russian Federation of 07.02.1992 № 2300-1 "On protection of consumer rights";
- Law of the Russian Federation of 07.02.1992 № 2300-1 "On protection of consumer rights"; Federal law of December 26, 1995 № 208-FZ "On joint stock companies" (JSC);
- resolution of the Government of the Russian Federation of 01.11.2012 № 1119 "On approval of requirements for the protection of personal data during their processing in information systems of personal data";
- the order of the Government of the Russian Federation of 15.09.2008 No. 687 "About the statement of Regulations on features of processing of the personal data performed without use of means of automation";
- the order of FSTEC of Russia of 18.02.2013 No. 21 "About the statement of Structure and the maintenance of organizational and technical measures for safety of personal data at their processing in information systems of personal data";
- Decree of the Government of the Russian Federation of 16.04.2012 № 291 "On licensing of medical activities";
- the Order of the Government of the Russian Federation of 04.10.2012 No. 1006 "About the approval of Rules of providing the paid medical services by the medical organizations";
- Order of the Ministry of health of the USSR of 04.10.1980 № 1030 "On approval of forms of primary medical documentation of health care institutions";
- the Order of the Ministry of health and social development of the Russian Federation (Ministry of health and social development of the Russian Federation) of 12.04.2011 No. 302n "About the approval of lists of harmful and (or) dangerous production factors and works at which performance obligatory preliminary and periodic medical examinations (inspections), and the Order of carrying out obligatory preliminary and periodic medical examinations (inspections) of the workers occupied at heavy works and at works with harmful and (or) dangerous working conditions" are carried out;
- by the Order of the Ministry of culture of the Russian Federation of 25.08.2010 № 558 "On approval of the "List of standard management archival documents formed



- in the course of the activities of state bodies, local governments and organizations, indicating the shelf life";
- Charter of "Clinic of Dr. Paramonov";
  - License of the Ministry of health of the Saratov region for medical activities;
  - other Federal and departmental normative legal acts and local acts of "Clinic of Dr. Paramonov".
2. For regulation of procedures and processes of processing of personal data Clinic of Dr. Paramonov has the right to publish the internal regulatory documents containing requirements for protection and the order of processing of personal data.

### 3. Basic concepts and definitions

1. Personal data – any information relating directly or indirectly to a specific or identifiable natural person (personal data subject).
2. Information – information (messages, data) regardless of the form of their presentation.
3. Operator – the state body, municipal body, legal entity or natural person, independently or together with other persons organizing and (or) carrying out processing of personal data, and also defining the purposes of processing of personal data, structure of the personal data which are subject to processing, the actions (operations) made with personal data.
4. Processing of personal data – any action (operation) or a set of actions (operations) performed with or without the use of automation tools with personal data, including the collection, recording, systematization, accumulation, storage, clarification (update, change), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data.
5. Automated processing of personal data – processing of personal data by means of computer technology.
6. Provision of personal data – actions aimed at disclosure of personal data to a certain person or a certain circle of persons
7. Distribution of personal data – actions aimed at disclosure of personal data to an indefinite number of persons
8. cross-Border transfer of personal data – 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.
9. Blocking of personal data – temporary termination of processing of personal data



- (except when processing is necessary to clarify personal data).
10. Destruction of personal data – actions as a result of which it becomes impossible to restore the content of personal data in the information system of personal data and (or) as a result of which material carriers of personal data are destroyed.
  11. Depersonalization of personal data – actions as a result of which it becomes impossible to determine the ownership of personal data to a specific subject of personal data without the use of additional information.
  12. Information system of personal data – a set of personal data contained in databases and ensuring their processing of information technologies and technical means.
  13. Company – "Clinic of Dr. Paramonov".
  14. the
  15. Customers – individuals and legal entities with which Companies are currently, have previously established a civil relationship, or that their actions Express their intention to establish such a relationship.
  16. Visitors – individuals in respect of whom measures are taken to control access to the protected objects of the Company.
  17. Employees – full-time employees of the Company, between whom and "Clinic of Dr. Paramonov" concluded an employment contract, or freelance part-time employees on the basis of civil contracts.

#### 4. personal data processing Time

1. Terms of personal data processing shall be determined in accordance with the validity period of civil relations between the personal data subject and the Company; limitation period; terms specified in the consent of the personal data subject; the terms established by the Order of the Ministry of culture of the Russian Federation of 25.08.2010 № 558 "On approval of the "List of standard management archival documents formed in the course of the activities of state bodies, local governments and organizations, indicating the terms of storage", as well as other requirements of the current legislation of the Russian Federation and local regulations of the Company.
2. The Company creates and stores documents containing information about the subjects of personal data. The requirements for the use of these standard forms of documents in the Company are established by the Decree of the Government of the Russian Federation of 15.09.2008 № 687 "On approval of the Regulations on the peculiarities of personal data processing carried out without the use of automation".



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Document generation date: 14.06.2026 08:20 MSK