**Personal Data Processing Policy**

**at Job For Arabists Employment Agency LLC**

This document defines the procedure, goals, principles, conditions and security of the processing of personal data.

The personal processing policy is developed in accordance with the requirements of Part 2 of Art. 18.1 of the Federal Law of July 27, 2006 No. 152-FZ “On Personal Data”.

Access to this document has any subject of personal data.

Personal data are processed with and without automation.

Job For Arabists recruitment agency LLC is entitled to post an amendment to this personal data processing policy or to make changes.

**1. Definition of terms:**

**personal data** – are any information relating to a directly or indirectly determined or being determined individual (subject of personal data);

**operator** – is a state body, municipal body, individual or legal entity, providing personal data processing independently or in cooperation with other individuals, as well as determining the purpose of personal data processing, the components of personal data to be processed, actions (operations) performed with personal data;

**personal data processing** - implies any action (operation) or a set of actions (operations) performed by using automation tools or without using such tools towards personal data, including collection, recording, systematization, accumulation, storage, clarification (updating, changing), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data.

**automated processing of personal data** – is processing of personal data using computer technology;

**distribution of personal data** – is actions aimed at disclosing personal data to an indefinite circle of persons;

**provision of personal data** – is actions aimed at the disclosure of personal data to a specific person or a certain circle of persons;

**blocking of personal data** – is temporary termination of the processing of personal data (unless the processing is necessary to clarify personal data);

**destruction of personal data** – is any actions aimed to the complete and irrevocable destruction of personal data with no possibility to further restore of personal data content in the personal data information system and (or) leading to total destruction of physical medium containing personal data;

**depersonalization of personal data** – is 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;

**personal data information system** – is a set of personal data contained in databases and processing information technologies and technical means;

**cross-border transfer of personal data** – is the transfer of personal data to the territory of a foreign state to a foreign state authority, a foreign individual or a foreign legal entity.

**2. Collection of personal data**

Job For Arabists recruitment agency LLC collects personal data that visitors enter on the website into the data fields provided by the visitors themselves, these include:

- first name, last name, patronymic

- date and place of birth

- address of registration and actual place of residence

- contact details (phone, email, skype)

- information about education, additional education, work experience, income

- information about the specialty

- information on continuing education and professional retraining

- other data that may be necessary in the framework of the goals and services provided

Passive collection of personal data of the current connection in terms of statistical information:

- page visit and IP address

- number and duration of visits

- entry and exit points

- country and region of the user

- provider, browser, user system languages

- OS, screen resolution, number of colours of the user's screen

**3. Purpose of processing personal data**

The purpose of processing personal data is:

- ensuring the protection of 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.

- identification of the parties within the framework of the services provided.

- assistance in job search for job applicants.

- provision of services and fulfilment of obligations under concluded agreements.

- processing applications, inquiries.

- the provision of recruitment and placement services.

- informing and improving the quality of services provided.

4. Principles of processing personal data

- The processing of personal data is carried out on a legal and fair basis, ensuring accuracy, adequacy, in certain cases, the relevance of personal data.

- The processing of personal data should be limited to the achievement of specific, predetermined and legitimate goals. Processing of personal data that is incompatible with the purposes of collecting personal data is not allowed.

- It is not allowed to combine databases containing personal data, the processing of which is carried out for purposes incompatible with each other.

- Only personal data that meet the purposes of their processing are subject to processing.

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- The content and volume of the processed personal data must comply with the stated processing goals. The processed personal data should not be redundant in relation to the stated purposes of their processing.

- Storage of personal data should be carried out in a form that allows you to determine the subject of personal data, in a time frame no longer than what is required by the purpose of processing personal data, if the storage period for personal data is not established by federal law, an agreement to which the beneficiary or guarantor is the subject of personal data. The processed personal data is subject to destruction or depersonalization upon achievement of the processing goals or in case of loss of the need to achieve these goals, unless otherwise provided by federal law.

**5. Terms of processing personal data**

The processing of personal data is carried out in the presence of one of the following conditions:

- the processing of personal data is carried out with the consent of the subject of personal data to the processing of his personal data;

- the processing of personal data is necessary to achieve the goals stipulated by the international treaty of the Russian Federation or the law, to carry out and fulfil the functions, powers and duties assigned to the operator by the legislation of the Russian Federation;

- the processing of personal data is necessary for the execution of an agreement to which either the beneficiary or guarantor is a party under which the personal data subject is, as well as for the conclusion of an agreement on the initiative of the personal data subject or an agreement under which the personal data subject will be the beneficiary or guarantor;

- the processing of personal data is necessary to exercise the rights and legitimate interests of the operator or third parties or to achieve socially significant goals, provided that this does not violate the rights and freedoms of the subject of personal data;

- the processing of personal data is carried out, access of an unlimited circle of persons to which is provided by the subject of personal data or at his request (hereinafter - personal data made publicly available by the subject of personal data);

- the processing of personal data subject to publication or mandatory disclosure in accordance with federal law is carried out.

The company does not process biometric personal data, special categories of personal data and does not carry out cross-border transfer of personal data.

**6. Rights of the subject of personal data**

The subject of personal data has the right:

- to decide on the provision of his personal data and give consent to their processing. Consent to the processing of personal data may be given by the subject of personal data or his representative in any form allowing confirming the fact of its receipt, unless otherwise provided by federal law. In case of obtaining consent to the processing of personal data from a representative of the personal data subject, the authority of this representative to give consent on behalf of the personal data subject is checked by the operator.

- require the Company to clarify his personal data, block it or destroy it if the personal data is incomplete, outdated, inaccurate, illegally obtained or is not necessary for the stated purpose of processing, and also take measures prescribed by law to protect its rights.

- receive information regarding his personal data, if such a right is not limited in accordance with federal laws.

- modify, update, supplement the provided personal data by contacting Job For Arabists Recruitment Agency LLC.

- withdraw consent to the processing of personal data.

In order to receive information or withdraw consent, written or electronic request must be sent. Written request is sent to the address: 127106, Moscow, Altufevskoe highway, 27, office 4390/1. Electronic request (signed in accordance with the Federal Law by electronic signature): Email: info@jobforarabists.com.

- apply for the protection of their rights to the appropriate authorities in case of violations.

**7. Confidentiality of personal data**

- Operators and other persons who have gained access to personal data are required not to disclose to third parties and not to distribute personal data without the consent of the subject of personal data, unless otherwise provided by federal law.

- To ensure confidentiality, the Company takes all the necessary technical, legal, program and organizational measures to ensure the protection of personal data (from unlawful or accidental access, destruction, alteration, blocking, copying, distribution, as well as from other illegal actions of third parties with it).