

**POLICY**  
**of the Moscow Metro State Unitary Enterprise**  
**regarding the Processing and Protection of Personal Data of Users**  
**of the UrbanTransportData International Analytical Project Website**

**1. General Provisions**

1.1. This Policy of the Moscow Order of Lenin and Order of the Red Banner of Labour named after V.I. Lenin Metro State Unitary Enterprise of Moscow (Taxpayer Identification Number: 7702038150, address: 41 Prospekt Mira, Bldg. 2, Moscow, Russia) (hereinafter – “the Metro”, “the Operator”) regarding the processing and protection of personal data of users of the UrbanTransportData international analytical project website (hereinafter – “the Policy”) has been developed for the purpose of implementing the requirements of the legislation of the Russian Federation in the field of personal data. The Policy constitutes an official document defining the general principles, purposes, and procedure for processing the personal data of users of the UrbanTransportData international analytical project website (<https://urbantransportdata.ru>) (hereinafter – “the Website”), as well as information on the measures implemented to protect their personal data.

1.2. The Policy has been developed in accordance with the Constitution of the Russian Federation, international treaties, legislative acts, and other regulatory legal acts of the Russian Federation in the field of personal data, in compliance with Clause 2 of Article 18.1 of Federal Law No. 152-FZ of 27 July 2006 “On Personal Data” (hereinafter – “the Federal Law on Personal Data”).

1.3. The Policy constitutes a local regulatory act of the Metro. The Policy applies exclusively to the Website and its users (a category of personal data subjects). The processing by the Metro of personal data of other categories of personal data subjects is regulated by other local regulatory acts of the Metro.

1.4. The Policy establishes the procedure for processing personal data, the measures for ensuring the security of personal data by the Operator, for the purpose of protecting the rights and freedoms of the Website users in the course of processing their personal data, including the protection of the rights to privacy, personal and family secrecy. The Policy sets forth the principles, purposes, and methods of processing personal data, the main categories of personal data processed by the Operator, and the rights of the Website users as personal data subjects.

1.5. For the purposes of this Policy, the following terms and definitions

shall apply.

UrbanTransportData – an international analytical platform intended for the collection, visualisation, and publication of urban transport indicators of cities worldwide, which will include a news portal, a professional forum for experts in the field of urban public transport development, and a knowledge base on urban transport.

The UrbanTransportData international analytical project website (the “Website”) – a compilation of graphic and informational materials, as well as computer software and databases, enabling their availability on the Internet at the network address <https://urbantransportdata.ru>.

User – an individual who gains access to the Website by creating a user account on the Website in the Internet and who has accepted the terms of this Policy.

Information – data (messages, facts) regardless of the form of their presentation.

Personal Data – any information relating to an identified or identifiable natural person (personal data subject), either directly or indirectly.

Operator – the Metro, which independently organises and/or carries out the processing of personal data, as well as determines the purposes of such processing, the composition of the personal data to be processed, and the actions (operations) performed with such data.

Processing of Personal Data – any action (operation) or a set of actions (operations) performed with or without the use of automated means with respect to personal data, including collection, recording, systematisation, accumulation, storage, clarification (updating, modification), retrieval, use, transfer (dissemination, provision, access), anonymisation, blocking, deletion, or destruction of personal data.

Dissemination of Personal Data – actions aimed at disclosing such data to an indefinite number of persons.

Provision of Personal Data – actions aimed at disclosing such data to a specific person or a specific group of persons.

Blocking of Personal Data – the temporary suspension of the processing of personal data (except where processing is necessary for their clarification).

Destruction of Personal Data – actions resulting in the impossibility of restoring the content of personal data in a personal data information system and/or resulting in the destruction of physical media containing personal data.

Anonymisation of Personal Data – actions resulting in the impossibility, without the use of additional information, of determining the affiliation of personal data to a specific personal data subject.

Personal Data Information System – a set of personal data contained in

databases, along with the information technologies and technical means ensuring their processing.

1.6. This Policy applies to all personal data that the Operator receives from personal data subjects – users of the Website – whose personal data processing is intended for the fulfilment of the purposes of processing specified in this Policy, and which are processed by the Operator with or without the use of automated means.

The provisions of this Policy extend to relations concerning the processing and protection of personal data obtained by the Operator after the approval of this Policy.

Personal data constitute confidential information and are subject to all requirements established by the Metro's local regulatory acts on the protection of confidential information.

1.7. Use of the Website constitutes the user's unconditional consent to this Policy and to the terms of processing of their personal data set out herein. In the event of disagreement with these terms, the user must refrain from using the Website.

## **2. Legal Grounds for the Implementation of the Policy**

The Policy is implemented in accordance with the following regulatory legal acts of the Russian Federation: the Constitution of the Russian Federation, the Civil Code of the Russian Federation, Federal Law No. 152-FZ of 27 July 2006 "On Personal Data", Federal Law No. 126-FZ of 7 July 2003 "On Communications", Federal Law No. 149-FZ of 27 July 2006 "On Information, Information Technologies and the Protection of Information", Federal Law No. 63-FZ of 6 April 2011 "On Electronic Signature", other regulatory legal acts of the Russian Federation, as well as regulatory documents of authorised state authorities.

## **3. Principles, Purposes, and Methods of Personal Data Processing by the Operator**

3.1. The processing of personal data by the Operator is carried out with due regard to the necessity of ensuring the protection of the rights and freedoms of users, including the protection of the right to privacy, personal and family secrecy, and is based on the following principles:

- personal data shall be processed on a lawful and fair basis;
- personal data processing shall be limited to achieving specific, predetermined, and lawful purposes;
- the processing of personal data incompatible with the purposes of their collection shall not be permitted;

- the merging of databases containing personal data, the processing of which is carried out for purposes that are incompatible with each other, shall not be permitted;

- only personal data relevant to the purposes of their processing shall be subject to processing;

- the content and scope of the personal data processed shall correspond to the stated purposes of processing;

- personal data must not be excessive in relation to the stated purposes of their processing;

- when processing personal data, their accuracy, sufficiency, and, where necessary, their relevance to the purposes of personal data processing shall be ensured. The Operator shall take the necessary measures to delete or rectify incomplete or inaccurate personal data;

- personal data shall be stored in a form permitting the identification of the user no longer than required by the purposes of personal data processing, unless a personal data retention period is established by federal law or by a contract to which the user is a party, a beneficiary, or a guarantor;

- personal data processed by the Operator shall be destroyed upon attainment of the purposes of processing, in the event that the necessity for achieving such purposes is lost, unless otherwise provided by federal law, as well as in the event of the user withdrawing their consent to the processing of personal data.

3.2. The Operator processes the personal data of users exclusively for the purposes of:

3.2.1. Providing users with the ability to register (log in) on the Website, and to access the Website and its personalised resources;

3.2.2. Establishing feedback with the user, including sending notifications and enquiries relating to the use of the Website, as well as handling requests and applications from the user;

3.2.3. Creating a user account, provided that the user has given consent to the creation of such account;

3.2.4. Providing the user with efficient customer and technical support in the event of issues related to the use of the Website;

3.2.5. Ensuring the functionality and security of the Website, for confirming actions performed by users, for preventing incidents of fraud, computer attacks and other abuses, as well as for investigating such incidents;

3.2.6. Publishing on the Website the user's personal data permitted by the user for dissemination.

3.3. The processing of personal data is carried out by the Operator using the following methods:

3.3.1. Non-automated processing of personal data;

3.3.2. Automated processing of personal data, with or without the transmission of the obtained information via the information and telecommunications network Internet.

3.4. The legal basis for processing a Website user's personal data is the user's consent to such processing. Website users give their consent to the processing of their personal data upon registration on the Website in their personal account.

#### **4. List of Users' Personal Data Processed by the Operator**

4.1. The list of users' personal data processed by the Operator is determined in accordance with the legislation of the Russian Federation and the Operator's local regulatory acts, taking into account the purposes of personal data processing specified in this Policy.

4.2. For the purpose of processing specified in Clause 3.2.1 of this Policy, the following user personal data shall be processed:

- surname, first name, patronymic (if any);
- email address;
- location (country, city);
- telephone number;
- account details: website identifier and related account data, registered devices, account status;
- usage information: data on actions performed and use of the Website;
- cookies;
- IP address;
- information about the organisation and/or educational institution where the user works/studies, position.

4.3. For the purpose of processing specified in Clause 3.2.2 of this Policy, the following user personal data shall be processed:

- surname, first name, patronymic (if any);
- email address;
- telephone number;
- account details: website identifier and related account data, registered devices, account status.

4.4. For the purpose of processing specified in Clause 3.2.3 of this Policy, the following user personal data shall be processed:

- surname, first name, patronymic (if any);
- email address;
- location (country, city);
- telephone number;

- IP address;
- information about the organisation and/or educational institution where the user works/studies, position.

4.5. For the purpose of processing specified in Clause 3.2.4 of this Policy, the following user personal data shall be processed:

- surname, first name, patronymic (if any);
- email address;
- location (country, city);
- telephone number;
- account details: website identifier and related account data, registered devices, account status;
- usage information: data on actions performed and use of the Website;
- cookies;
- IP address.

4.6. For the purpose of processing specified in Clause 3.2.5 of this Policy, the following user personal data shall be processed:

- account details: website identifier and related account data, registered devices, account status;
- usage information: data on actions performed and use of the Website;
- cookies;
- IP address.

4.7. For the purpose of processing specified in Clause 3.2.6 of this Policy, the following user personal data shall be processed:

- surname, first name, patronymic (if any);
- email address;
- location (country, city);
- account details: website identifier;
- information about the organisation and/or educational institution where the user works/studies, position.

4.8. The Metro does not carry out cross-border transfer of personal data.

## **5. Specific Features of Processing Personal Data Authorized by the Personal Data Subject for Dissemination**

5.1. Personal data may be disseminated to an indefinite number of persons solely with the user's written consent, obtained in accordance with the provisions of Part 4 of Article 9 and Article 10.1 of the Federal Law "On Personal Data."

5.2. Consent to the processing of personal data authorized by the user for dissemination shall be executed separately from any other consents of the user to their processing. The Operator must provide the user with the opportunity to

determine the list of personal data authorized for dissemination for each category specified in Clause 4.2 of this Policy.

If it does not follow from the consent provided by the user for the processing of personal data authorized for dissemination that they have agreed to such dissemination, such personal data shall be processed by the Operator without the right to disseminate them.

5.3. The transfer (dissemination, provision, access) of personal data authorized by the user for dissemination shall be terminated at their request within 30 days from the date the Operator receives the respective request. Such a request must include: surname, first name, patronymic (if any), contact information (telephone number, email address), as well as a list of personal data whose processing is to be terminated. The personal data specified in such request may only be processed by the Operator to whom such request has been addressed.

## **6. List of Actions with Users' Personal Data and Methods of Their Processing**

6.1. The Operator carries out the collection, recording, systematisation, accumulation, storage, clarification (updating, modification), retrieval, use, anonymisation, blocking, deletion, and destruction of users' personal data, performed with or without the use of automated means.

6.2. The Operator shall not provide or disclose information containing users' personal data, the processing of which is intended for the fulfilment of the purposes specified in this Policy, to any third party without the written consent of the personal data subjects, except in cases where such provision is necessary to prevent a threat to the life, health, or other vital interests of the user, when obtaining their consent is impossible, as well as in cases established by federal laws.

6.3. Upon a reasoned request and solely for the performance of the functions and powers vested by law, a user's personal data may be transmitted without their consent to governmental bodies and organisations in cases established by the legislation of the Russian Federation.

## **7. Rights of Users**

7.1. In accordance with Article 14 of the Federal Law "On Personal Data," the user has the right to obtain information relating to the processing of their personal data by the Operator.

The user has the right to request the Operator to clarify their personal data, block or destroy them if such data are incomplete, outdated, inaccurate, unlawfully

obtained, or cannot be deemed necessary for the stated purpose of processing, and also to take legal measures provided by law to protect their rights.

7.2. The user's right to access their personal data may be restricted in accordance with federal laws, including in the cases provided for by Part 8 of Article 14 of the Federal Law "On Personal Data."

7.3. To exercise their rights and protect their lawful interests, the user shall be entitled, in the manner prescribed by Article 14 of the Federal Law "On Personal Data," to contact the Operator by sending an appropriate request to the Operator's email address: UrbanTransportData@mos.ru. In order to fulfil such requests, the Operator may need to verify the user's identity and request additional information from them.

7.4. The Operator shall review user complaints and enquiries relating to the processing of personal data, carefully investigate any violations, and take all necessary measures to immediately remedy them, discipline the responsible officials, and settle disputes and conflicts out of court.

If the user believes that the Operator is processing their personal data in violation of the requirements of the Federal Law "On Personal Data," or is otherwise infringing their rights and freedoms, they have the right to appeal the actions (or inaction) of the Operator to the authorised body for the protection of the rights of personal data subjects or in a court of law.

## **8. Measures to Ensure the Security of Users' Personal Data During Their Processing**

8.1. The primary objective in ensuring the security of users' personal data during their processing by the Operator is to prevent unauthorised access to them by third parties, and to prevent intentional software, technical, or other impacts aimed at theft of personal data, or their destruction, elimination, or alteration during processing.

When processing users' personal data, the Operator shall adopt all necessary legal, organisational, and technical measures to protect them from unlawful or accidental access, destruction, alteration, blocking, copying, provision, dissemination, as well as from other unlawful actions in relation to personal data.

8.2. Measures to ensure the security of users' personal data during their processing in personal data information systems shall be established in accordance with the legislative acts of the Russian Federation and the Operator's local regulatory acts governing the security of personal data in personal data information systems.

8.3. In ensuring the security of users' personal data, the Operator shall be guided by the following principles:



8.3.1. Lawfulness: the protection of personal data is based on the provisions of regulatory legal acts and methodological documents of authorised state bodies in the field of personal data processing and protection;

8.3.2. Systematic approach: personal data processing is carried out with consideration for all interrelated, interacting, and time-varying elements, conditions, and factors significant for understanding and solving the problem of ensuring the security of personal data;

8.3.3. Comprehensiveness: the protection of personal data is organised using the functional capabilities of information technologies implemented in the Operator's information systems and other protection systems and tools at its disposal;

8.3.4. Continuity: personal data protection is ensured at all stages of their processing and in all operation modes of personal data processing systems, including during maintenance and scheduled works;

8.3.5. Timeliness: measures ensuring an adequate level of personal data security are taken before their processing begins;

8.3.6. Continuity and ongoing improvement: the modernisation and enhancement of measures and means of personal data protection are carried out based on the results of analysing the practice of their processing in the Metro, taking into account the identification of new methods and means of implementing personal data security threats, as well as domestic and foreign experience in the field of information protection;

8.3.7. Personal responsibility: responsibility for ensuring the security of personal data is assigned to the Operator's employees within the scope of their job duties related to the processing and protection of personal data;

8.3.8. Access rights minimisation: access to users' personal data shall be granted to the Operator's employees only to the extent necessary for the performance of their job duties;

8.3.9. Flexibility: ensuring the performance of personal data protection functions in the event of changes to the operating characteristics of the Operator's personal data information systems, as well as to the volume and composition of the personal data being processed;

8.3.10. Transparency of protection algorithms and mechanisms: the structure, technologies, and algorithms of the Operator's personal data protection system shall not allow for the circumvention of the existing security measures by personal data security violators;

8.3.11. Scientific justification and technical feasibility: the level of the Operator's personal data protection measures shall be determined by the current state of development of information technologies and information protection tools;

8.3.12. Continuous monitoring and evaluation: the Operator shall establish

procedures for the ongoing monitoring of the use of personal data processing and protection systems, with the results of such monitoring analysed on a regular basis.

## **9. Liability for the Disclosure of Confidential Information Related to Personal Data**

9.1. Employees of the Operator found guilty of violating the rules governing the processing and protection of users' personal data and this Policy shall bear material, disciplinary, administrative, civil, or criminal liability in accordance with the procedure established by the legislation of the Russian Federation.

9.2. In the event of the loss or disclosure of a user's confidential data, the Operator shall not be liable if such data:

- became part of the public domain before their loss or disclosure;
- were disclosed with the user's consent or by the user themselves;
- were disclosed by third-party websites and services, links to which are available on the Website, in the event such links and services are used by the user;
- were disclosed not as a result of their receipt or processing by the Operator.

9.3. The user shall be solely responsible for any consequences arising from the provision of inaccurate and/or incomplete personal data.

## **10. Final Provisions**

10.1. Other rights and obligations of the Operator in the implementation of this Policy shall be determined by the legislation of the Russian Federation in the field of personal data.

10.2. The Operator shall be entitled to make amendments to this Policy without the consent of the user.

10.3. The current version of this Policy is published at: <https://urbantransportdata.ru>.

10.4. This Policy shall be governed by and construed in accordance with the legislation of the Russian Federation.

10.5. The user undertakes to review the terms of this Policy at least once a month, as well as to familiarise themselves with the Operator's notices and messages regarding the procedure and rules for the application of this Policy.

## **Contact Information**

Operator: Moscow Metro State Unitary Enterprise

Address: 41 Prospekt Mira, Bldg. 2, Moscow, 129110, Russia.

Tel./Fax: +7 (495) 622-10-01 / +7 (495) 631-37-44.

E-mail: [metro@transport.mos.ru](mailto:metro@transport.mos.ru).

Website: [transport.mos.ru](http://transport.mos.ru), [mosmetro.ru](http://mosmetro.ru).

The authorised body for the protection of the rights of personal data subjects is the Federal Service for Supervision of Communications, Information Technology and Mass Media (Roskomnadzor).

Territorial authority: Roskomnadzor Administration for the Central Federal District.

Address: 2 Starokashirskoe Highway, Bldg. 10, GSP-7, Moscow, 117997, Russia.

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