



DECEMBER 2012

January 1, 2013: deadline for notification of Roskomnadzor on personal data processing

After January 1, 2013 companies processing personal data (Operators) and their officers may be brought to administrative liability for failure to submit to the competent authority additional information on personal data processing.

Federal Law of 27.07.2006 No. 152-FZ 'On Personal Data' (the Law) provides for an obligation of an Operator to notify the competent authority (Roskomnadzor) of its intent to process personal data.

By January 1, 2013, Operators that had processed personal data and notified Roskomnadzor before July 1, 2011 must submit to Roskomnadzor additional data in the form of Information Letter.

Operators that have commenced the processing of personal data, but have not yet notified Roskomnadzor, may be brought to administrative liability for failure to notify.

Not all companies processing personal data are subject to notification of Roskomnadzor. The Law provides for certain exceptions.

Egorov Puginsky Afanasiev & Partners will be glad to assist in determining whether your company is subject to notification of the competent authority and in preparing such notification following requirements of the law and recommendations by Roskomnadzor.

*The notification forms are provided in Annexes No. 2 and 3 to the Administrative Regulations of the Federal Service for Supervision in the Sphere of Telecom, Information Technologies and Mass Communications on the provision of public services "The maintaining of the register of operators engaged in the processing of personal data", approved by order of the Ministry of Communications and Mass Media of the Russian Federation of 21.12.2011 N 346.



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