

January 14, 2016

Inspections to be held by Russian Data Protection Authority in 2016

Dear All,

We would like to inform you that Russian Data Protection Authority (Roskomnadzor) has announced its plan of inspections for 2016 aimed at checking compliance with personal data legislation.

Altogether, Roskomnadzor intends to hold about 1 000 inspections. Among businesses to be checked are e-commerce (e.g., Wildberries, Ozon), banks (e.g., CityBank, UniCredit Bank, Moscow Credit Bank, HSBC), automobile industry (e.g., Volkswagen, Chrysler), cosmetics (e.g., Avon, Oriflame, Yves Rocher), IT companies (e.g., Microsoft, Samsung, HP). The list includes names of Russian entities only and is silent for Google, Twitter and Facebook.

Roskomnadzor has not come up yet with the consolidated list of scheduled inspections. However, lists of inspections of its territorial departments are available. Please find below a link to the list of inspection to be held by the Department of Roskomnadzor in the Central Federal District (covering companies registered in Moscow, Moscow region as well as some other neighboring regions):

<http://77.rkn.gov.ru/p5275/p10219/p18795/> (please note that information is in Russian).

We recommend starting already now preparing for the inspections. In particular, it is preferable to check if all the required internal documents and policies are in place as well as the IT documents demonstrating compliance with the data localization law can be disclosed promptly to the inspecting authorities. If any our assistance with the preparing is needed, we will be happy to do so.

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We hope you will find this information helpful. Should you have any questions, please do not hesitate to contact **Irina Anyukhina** (ianyukhina@alrud.com), Partner of ALRUD.

Kind regards,

ALRUD Law firm

Note: All information was obtained from publicly available sources. The author of this information letter assumes no liability for the consequences of decision-making based on such information.