

26.05.2025

Important! Increase of fines for violations in the field of personal data processing

Dear colleagues,

please note that starting from May 30, 2025, amendments to the Code of Administrative Offenses of the Russian Federation will enter into force, which will significantly increase fines for legal entities and individual entrepreneurs for failure to submit a notification to the Federal Service for Supervision of Communications, Information Technology and Mass Media (Roskomnadzor) concerning the processing of personal data of their employees (as well as other categories of persons whose data was received and is subject to processing). In this case, the processing of personal data means any actions with data, including collection, recording, systematization, storage, updating, distribution, deletion.

These changes are relevant for all employers, since by default any organization or individual entrepreneur with employees processes the personal data of employees (full name, passport data, salary data, etc.), and therefore must be registered accordingly in the register of operators of Roskomnadzor.

Prior to the aforementioned changes entering into force, organizations committing a violation of such rules could be subject to a warning or a fine of up to 5 000 rubles in accordance with Article 19.5 of the Code of Administrative Offenses of the Russian Federation. In practice, however, the supervisory authority would usually limit itself to requiring notification to be submitted within the specified time period.

Starting from May 30, 2025, the fines for failure to submit a notification to Roskomnadzor will be as follows:

- for company officials and individual entrepreneurs from 30 000 to 50 000 rubles;
- for legal entities from 100 000 to 300 000 rubles.

Therefore, if your company has not yet sent the relevant notification to Roskomnadzor, it must be submitted as soon as possible. You can check whether your company is included in the register of Roskomnadzor by following this <u>link</u>.

The notification can be sent to the department on paper, through the Unified Identification and Authentication System on the internet Portal of Government Services, or in electronic form using a qualified electronic signature.

We also recommend that you $\underline{\text{read}}$ the department's comments and answers to frequently asked questions.

We are ready to help prepare a personal data processing notification and support you in promptly sending it to Roskomnadzor.

We will be happy to answer your questions.

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