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Act of assessment of the effectiveness
of measures taken to ensure personal data security
in the information system
“Cloud powered by VMware”

Revision 3 dated April 30, 2020

1. Selectel Ltd. carried out performance evaluation of the measures implemented, and of compliance of the protection system utilized for the information system "Cloud powered by VMware" with the requirements to ensure personal data security as per Order No. 21 by the FSTEC of Russia of February 18, 2013 "On the Approval of the Scope of Organizational and Technical Measures to Ensure Personal Data Security in the Course of its Processing in Personal Data Information Systems."
2. Technical tools in the information system "Cloud powered by VMware" are hosted at the following sites:
 - Tsvetochnaya 2 Data Center, 28-K Kolya Tomchak ulitsa, Saint Petersburg
 - Dubrovka 3 Data Center, 1 Sovetskaya ulitsa, Dubrovka Village, Leningrad Region
 - Aviamotornaya Data Center, 69 Aviamotornaya Street, Moscow
 - Berzarina 2 Data Center, 36-3 Berzarina Street, Moscow
3. The threats recognized as relevant to the information system "Cloud powered by VMware" include Type 3 threats not related to the existence of undocumented (undeclared) capabilities in the system software and application software used in the information system.
4. The performance of the implemented measures is evaluated in compliance with the program and methodology as an acceptance testing of the protection system for the information system "Cloud powered by VMware".
5. Based on the evaluation of the performance of the measures implemented and the compliance of the protection system with the requirements for personal data protection, we determined that the protection system used in the information system "Cloud powered by VMware" complies with the requirements for the scope of measures implemented to ensure the security of Level 3 personal data protection (3-PL).
6. The evaluation results remain valid for 3 (three) years. If the structural or functional characteristics of the system are subject to change, a repeat evaluation must be performed.
7. Selectel Ltd. and the Customer are jointly responsible for ensuring security and complying with legal requirements. The delimitation of the areas of responsibility is provided in [Annex 1](#).
8. The list of measures implemented for the infrastructure of Cloud powered by VMware and of measures, the implementation of which will enable customers to comply with the requirements for Level 3 personal data protection, is provided in [Annex 2](#).

**Deputy CEO
for Product Development and Operation**



S. Pimkov

April 30, 2020



List of revisions

Revision	Date	Revisions
1	June 25, 2019	Source document. Assessment of the effectiveness of measures implemented in the following sites: Tsvetochnaya 2, Dubrovka 3, Aviamotornaya.
2	November 18, 2019	The new revision of the document supersedes the revision of June 25, 2019 and is effective from November 18, 2019. Berzarina 2 site has been added. Assessment of the effectiveness of measures implemented in the following sites: Tsvetochnaya 2, Dubrovka 3, Aviamotornaya, Berzarina 2.
3	April 30, 2020	The new revision of the document supersedes the revision of November 18, 2019 and is effective from April 30, 2020. The outline of responsibilities for compliance with safety and legal requirements were added.