



Personal data and biometry: new fines

On 12 December 2023, [amendments](#)* were made to the Russian Code of Administrative Offences, signalling significant changes:

- Higher fines for processing personal data without written consent were implemented; and
- Additionally, a new fine was introduced for violating biometric data processing regulations.

This marks a continued trend toward stricter regulations governing personal data processing. Apparently, the lawmakers try to encourage companies to prioritise personal data protection. These changes are likely to be followed by the introduction of substantial fines for data breaches.

Personal data processing without written consent

The amendments concern fines for personal data processing without the data subject’s written consent, if required by law, or for failing to comply with the requirements for the content of the said written consent.

First violation

Category	Before	After
Officials	RUB 20,000 – 40,000 (EUR 205 – 411)	RUB 100,000 – 300,000 (EUR 1,027 –3,080)
Legal entity	RUB 30,000 – 50,000 (EUR 308 – 513)	RUB 300,000 – 700,000 (EUR 3,080 – 7,187)

Repeated violation

Category	Before	After
Officials	RUB 40,000 – 100,000 (EUR 411 – 1,027)	RUB 300,000 –500,000 (EUR 3,080 – 5,133)
Individual entrepreneur	RUB 100,000 – 300,000 (EUR 1,027 – 3,080)	RUB 500,000 – 1,000,000 (EUR 5,133 – 10,267)
Legal entity	RUB 300,000 – 500,000 (EUR 3,080 – 5,133)	RUB 1,000,000 – 1,500,000 (EUR 10,267 – 15,340)

Violation of biometric personal data processing requirements

The amendments address the liability associated with the violation of the law when banks, multifunctional centres and other organisations place and update biometric personal data within the Unified Biometric System.

The fines for such a violation will range from RUB 100,000 (EUR 1,027) to RUB 300,000 (EUR 3,080) for officials and from RUB 500,000 (EUR 5,133) to RUB 1,000,000 (EUR 10,267) for legal entities.

In our recent [update](#), we outlined the regulations governing data processing within the Unified Biometric System.

Our recommendations

Considering the increased government focus on the protection of personal data and the implementation of new fines, we recommend that companies review their internal processes for processing personal data and ensure compliance with applicable requirements.

For companies working with the Unified Biometric System, it is recommended to verify that procedures for placing and updating biometric data in the system align with the requirements outlined in the legislation.

* *In Russian*

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