SmartSuite

Framework / Privacy / Global Privacy Regulations

Russia — Federal Law No. 152-FZ (Personal Data)

Russia's Federal Law 152-FZ requires notification before processing, localization of Russian citizens' data, protection-level security measures and 24-hour leak reports to Roskomnadzor.



What it is

Federal Law No. 152-FZ "On Personal Data" is Russia's personal data protection law. Every operator that processes personal data must notify Roskomnadzor before starting, keep Russian citizens' data in databases located in Russia when collecting it, and report data leaks within 24 and 72 hours. The Duma adopted it on July 8, 2006, it was signed on July 27, 2006 and it has been in force since January 26, 2007.

The State Duma enacted the law and Roskomnadzor, the Federal Service for Supervision of Communications, Information Technology and Mass Media, supervises it. It applies to state and municipal bodies, legal entities and individuals (article 1(1)), and since 2022 to foreign companies that process Russian citizens' data under contracts or consents involving those citizens (article 1(1.1)). It has been amended many times, most recently by Federal Law No. 265-FZ of July 26, 2026.

At a glance

PUBLISHER State Duma of the Russian Federation (enacted); supervised by Roskomnadzor	TYPE Regulation	VERSION Federal Law No. 152-FZ of July 27, 2006, as amended (latest amending law listed: No. 265-FZ of July 26, 2026)
EFFECTIVE January 26, 2007	DOMAIN Privacy	FAMILY Global Privacy Regulations
REGION Russia	ADOPTION MODEL Regulatory Compliance	IMPLEMENTATION COMPLEXITY High

Source: pravo.gov.ru/proxy/ips/?docbody=&nd=102108261

Why it matters

- **Localization** Recording, systematizing, accumulating, storing, updating and extracting Russian citizens' personal data in databases outside Russia is not allowed except in cases the law lists (article 18(5), as amended by Federal Law 23-FZ of February 28, 2025).
- **Two-step leak reporting** After an unlawful or accidental transfer of data that violates data subjects' rights, the operator notifies Roskomnadzor within 24 hours, then within 72 hours with the internal investigation results (article 21(3.1)).
- **Notification before processing** Operators notify Roskomnadzor before processing begins, and since September 1, 2022 most earlier exemptions no longer apply (article 22).
- **Cross-border transfer notice** A separate notice precedes any cross-border transfer, with the recipient's data protection measures assessed first, and Roskomnadzor can restrict the transfer (article 12).

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How SmartSuite supports 152-FZ

Processing Inventory and Purposes

Record each processing purpose, categories of data and subjects, legal ground and database location (articles 5, 6 and 18.1).

Localization Register

Mark where each Russian citizen dataset is collected and stored and the article 18(5) exception relied on, if any.

Consent and Rights Requests

Store consents and run access and other requests with deadlines and an audit trail (articles 9 and 14).

Security Measures and Protection Levels

Track the article 19 measures, conformity-assessed tools and effectiveness checks against each information system.

Leak Response Clock

Time each incident against the 24-hour notice and 72-hour investigation report, with the notifying owner and evidence (article 21(3.1)).

Transfer and Inspection Evidence

Keep Roskomnadzor notifications, cross-border transfer notices, recipient assessments and the documents an inspection can request (articles 12, 18.1(4) and 22).

Common framework mappings

CIS Controls v8.1 · COBIT 2019 · GDPR · ISO 27001:2022 · ISO 27002:2022 · ISO 27701 · NIST CSF 2.0 · NIST 800-53 Rev.5 · PCI DSS 4.0.1 · SOC 2

Official resources

Federal Law No. 152-FZ On Personal Data

The text of Russia's personal data law, as amended.

pravo.gov.ru/proxy/ips/?docbody=&nd=102108098

Frequently asked questions

Who must comply with Federal Law 152-FZ?

State and municipal bodies, legal entities and individuals that process personal data, and foreign legal entities and individuals that process Russian citizens' data under contracts or consents involving those citizens (article 1(1) and (1.1)). Purely personal and family use and state secrets are outside the law (article 1(2)).

What is the data localization rule?

When personal data of Russian citizens is collected, including over the internet, recording, systematizing, accumulating, storing, updating and extracting it using databases outside Russia is not allowed, except in the cases the article lists (article 18(5), as amended by Federal Law 23-FZ of February 28, 2025).

How fast must a data leak be reported?

After an unlawful or accidental transfer of personal data that violates data subjects' rights, the operator notifies Roskomnadzor within 24 hours of the incident, its suspected causes and harm, and within 72 hours of the results of its internal investigation and the persons responsible (article 21(3.1)).

Do operators notify Roskomnadzor before processing?

Yes. An operator notifies Roskomnadzor of its intention to process personal data before it starts, unless an exemption in article 22(2) applies. The older exemptions in points 1 to 6 ceased from September 1, 2022 (article 22).

What is needed before sending personal data abroad?

A separate notification to Roskomnadzor before the transfer, after the operator obtains information on the recipient's protection measures and the law of its country. Roskomnadzor can prohibit or restrict the transfer on grounds such as national security or citizens' rights, and decides within ten working days (article 12).

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License included / downloadable: Yes The law is published by the Russian Federation on its official legal portal and is included with the platform for reference.

Full framework page and mappings: smartsuite.com/frameworks/emea-russia-regional-cybersecurity-data-protection-requirements-152-fz

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