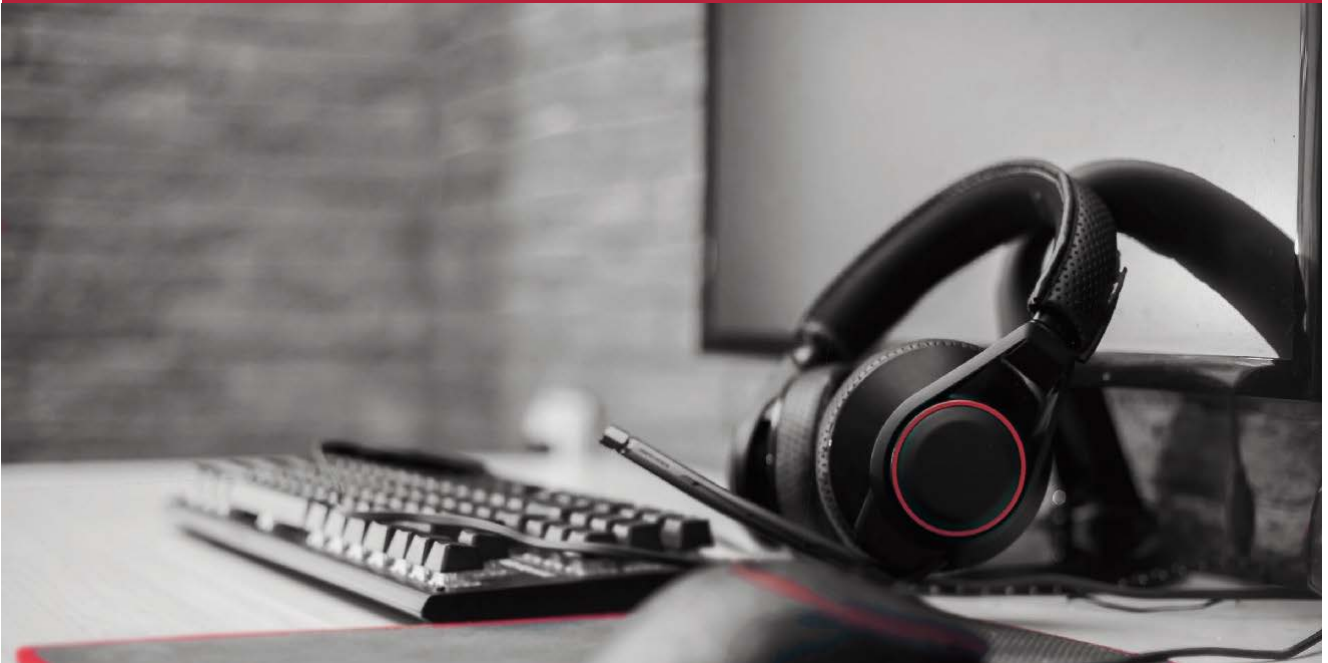


Registration of corporate SIM cards: important clarifications from Russia's Ministry of Digital Development, Communications and Mass Media



All companies and individual entrepreneurs that concluded contracts with mobile phone operators earlier than 1 June 2021 are required to disclose information on all corporate mobile numbers to a special federal state information system by 30 November 2021.

Such a deferral is not stipulated for new corporate numbers: they must be registered immediately.

Federal Law No. 533-FZ dated 30 December 2020 "On the Introduction of Amendments to the Federal Law *On Telecommunications*" stipulates that such information must be confirmed by the user of the corporate SIM card (employee) or entered by the latter through the use of the Unified Portal of Public and Municipal Services – the Public Services Portal (Gosuslugi) (<https://www.gosuslugi.ru/>).

In practice, foreign companies and their employees working in Russia encounter a number of difficulties when registering corporate SIM cards. We analyse them here, taking into account the most recent clarifications of the Ministry of Digital Development, Communications and Mass Media of the Russian Federation ("**Ministry of Digital Development**") granted to us further to a request from ADVANT Beiten.

Mandatory registration on the Public Services Portal

To confirm his or her SIM card, the employee must have an account on the Public Services Portal. Furthermore, the individual's user account must be confirmed. To confirm this account, the employee is required, bringing along their passport and individual insurance account number (SNILS), to contact one of the bank partners of this programme, (on the date of this information letter, the following banks were listed as such partners: Sber, VTB Bank, Tinkoff Bank, Post Bank, Bank Saint Petersburg, Ak Bars Bank, SKB Bank, Gazenergobank, DeloBank, RNCB Bank, PSB Bank, Bank Avangard, MTS Bank), the service centre "My Documents" or an office of Russian Post, or do this independently online on the Public Services Portal, provided that they have an enhanced qualified electronic signature.

A foreign organisation may only register on the Public Services Portal if it has a representative office or branch in Russia which has been registered with the Federal Tax Service.

In addition, foreign citizens may only register on the Public Services Portal if they have an individual insurance account number that they can obtain from the centres "My Documents" or from the Pension Fund of Russia.

The legislator did not stipulate any other procedure for activating corporate SIM cards, which is also confirmed by the clarifications of the Ministry of Digital Development.

One employee may have several SIM cards

No limitations are stipulated by the Law regarding the number of SIM cards that may be registered with one employee.

The Ministry of Digital Development also confirms in its clarifications that there is no limit on the corporate numbers that may be registered with an employee who has a "confirmed" account on the Public Services Portal.

What should be done about a SIM card if an employee resigns or is dismissed?

If a company employee who has a corporate SIM card registered in his name, resigns/is dismissed, this employee may independently delete the registered corporate number from the Public Services Portal. All the employee needs to do on the Public Services Portal is to click the "delete" button against their respective corporate number in the "Corporate Communications" section.

If a former employee did not delete their former corporate number from the Public Services Portal for some reason, this will not create a problem for the employer: when the employer enters information on the new user of this SIM card, or the new employee provided with this SIM card registers it on the portal, then the number of the previous user will be automatically "unlinked".

What will happen after 30 November 2021?

If organisations or their employees do not register/confirm their corporate SIM cards on the Public Services Portal by the end of this month, effective 1 December 2021 the mobile phone operator is required to stop providing telecommunications services for this subscriber number, whereof it must duly notify the respective legal entity or individual entrepreneur.

If no response is received by the established deadline, the subscriber number is deleted from the contract between the mobile phone operator and the legal entity or individual entrepreneur.

Kind regards,

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