

## **Personal Data Processing Policy of Delovaya Set Ltd**

### **1. Overview**

1.1. This Policy defines basic principles, goals, conditions and methods of processing personal data by Delovaya Set Ltd (hereinafter – the Company).

1.2. The Policy is developed for compliance with the law of the Republic of Belarus dated 07.05.2021 No. 99-3 "On the Protection of Personal Data" (hereinafter – the Personal Data Protection Law).

1.3. The Company is an Operator that processes personal data on its own.

1.4. The terms contained in Article 1 of the Personal Data Protection Law are used in this Policy with the same meaning.

1.5. The following terms are used in this Policy:

1.5.1. Website - Company's Internet resources [www.bn.by](http://www.bn.by); [freewifiminsk.by](http://freewifiminsk.by).

1.5.2. Services - any services available when using Company's Site; Company's products, software, events.

1.5.3. Customer - a personal data subject, an individual or legal entity (individual entrepreneur) with whom the Company has concluded a contract, or who intends to conclude a contract.

1.6. The policy is applied to all personal data processed by the Company, including personal data that can be obtained from personal data subjects when using (visiting) the Company's Site and services available when using the Site.

1.7. Personal data processing is based on the consent of the personal data subject (except for cases established by law when the personal data processing is carried out without obtaining such consent).

1.8. By using the Site and its services, the personal data subject fully agrees with the terms of this Policy, confirms that their rights are explained and understandable to them, and gives their consent to the processing of personal data provided to the Company.

### **2. List of data subjects**

2.1. The following categories of data subjects have their data processed by the Company:

2.1.1. individual customers (private persons),

2.1.2. representatives, staff members and employees of institutions, legal entities and individual entrepreneurs in cases involving both these entities and Company,

2.1.3. Company's website and online-services visitors,

2.1.4. individuals who share their personal data to subscribe to the Company's newsletter,

2.1.5. individuals who share their personal data by filling out questionnaires during Company's promotional events, or when sending a review or request,

2.1.6. other data subjects who share their personal information with Company.

### **3. Scope of personal data**

3.1. The Company processes the following personal data:

- full name;
- date of birth;
- identity document data (passport of the Republic of Belarus citizen; foreign citizen passport, residence permit, refugee certificate);
- permanent or temporary residence;
- email address;
- speciality;
- place of work;
- individual taxpayer number;

- current account number;
- IP address;
- browser information;
- mobile phone number;
- city phone number;
- MAC address of the customer device;
- history of views on the Site and services available when using the Site;
- user behaviour and preferences data obtained through such services as Google Analytics, Google Tag Manager, Yandex.Metrica; ClientID (browser identifier by cookie).

3.2. The Company ensures that the content and volume of processed personal data comply with the stated processing goals. If necessary, the Company takes measures to eliminate its redundancy.

3.3. To achieve the purposes of the processing, the Company has the right to transfer personal data to third parties in compliance with the law.

#### **4. Purposes for personal data collecting**

4.1. The Company collects and processes personal data for the purposes of:

4.1.1. concluding contracts with the data subjects, further contract performing, amending and termination;

4.1.2. identification of Company contract's party;

4.1.3. communication with the data subjects;

4.1.4. Company's products and services promotion through direct contacts and negotiations with the data subjects;

4.1.5. the use of the Company's website and online services by the data subjects;

4.1.6. customer technical support in assisting the data subjects;

4.1.7. providing information on Company's activity and Company's services improvement and promotion;

4.1.8. sending notifications, messages and advertising offers to the data subjects;

4.1.9. carrying out advertising campaigns, promotional events and marketing surveys through the website and any other web services available on it;

4.1.10. customer maintenance with the help of the client's personal account (user interface) on the Company's website.

#### **5. Procedure and conditions for personal data processing**

5.1. Personal data processing is carried out with the consent of the personal data subject, except for cases established by law when the processing of personal data is carried out without such consent.

5.2. The consent of the personal data subject is a free, unambiguous, informed expression of their will.

5.3. The subject of personal data expresses their consent to the processing of personal data in the following ways:

5.3.1. by clicking on the consent checkbox in forms on the Site or other resources linked to the Company accounts. Links to such forms can be sent via SMS, messengers, e-mail, messages on official Company's pages in social networks;

5.3.2. by mark in written form that requires to conclude a contract.

5.4. The processing of biometric personal data (for example, photographs) is carried out by the law.

5.5. The processing of personal data includes the following actions: collection, systematization, storage, modification, use, depersonalization, blocking, distribution, provision, deletion of personal data.

5.6. The processing of personal data is carried out in the following ways:

5.6.1. using automation tools with the transfer of the received information over information and

communication networks and without such transfer;

5.6.2. without the use of automation tools;

5.6.3. mixed method.

5.7. The storage of personal data allows to determine the subject of personal data and is carried out for a period not longer than the purpose of processing personal data requires, except for cases when the storage period is established by law or a contract concluded with the subject of personal data.

5.8. The condition for the termination of the personal data processing is the achievement of the processing goals, processing time expiration, consent withdrawal, as well as the identification processing of personal data as illegal.

5.9. The company carries out technical and cryptographic protection of personal data according to the procedure by the Operational and Analytical Center under the President of the Republic of Belarus. The company also takes technical, organizational and legal measures to ensure the protection of subscribers' personal data from unauthorized or accidental access, destruction, deletion, modification, blocking, copying, distribution, as well as from other illegal actions to personal data.

## **6. Basic rights and obligations of the Company**

6.1. The Company has the right to:

6.1.1. determine for itself the composition and list of measures that are necessary and sufficient for fulfilling the Company's obligations in conformity to the law "On Protection of Personal Data", as well as to any other laws or regulations passed in accordance therewith, unless otherwise provided by legislation.

6.1.2. entrust the processing of personal data to another person or entity based on a contract concluded with that person or entity, unless otherwise provided by legislation. The person or entity processing personal data on behalf of the Company is obliged to comply with the principles and rules of personal data processing provided for by the law "On Protection of Personal Data".

6.1.3. continue personal data processing without the data subject's consent in the case of data subject's withdrawal of consent to the personal data processing, if there are grounds specified in the law "On Protection of Personal Data".

6.2. The Company is obliged to:

6.2.1. provide processing of the personal data in accordance with the law "On Protection of Personal Data";

6.2.2. respond to data subject's requests and issues in accordance with the law "On Protection of Personal Data";

6.2.3. report any data security breaches to the relevant competent authorities immediately, and at the latest within three working days after the Company has become aware of the incident;

6.2.4. comply with the requirements of the authorized body for the protection of the personal data subject's rights to eliminate violations of the personal data legislation.

6.3. The personal data subject has the right to:

6.3.1. be provided with information on their personal data processing, except for cases provided for by law. The information should be presented to the data subject in an accessible form, and it should not contain the personal data related to other personal data subjects, except there are legal reasons for such personal data disclosure. The list of information and the procedures for its obtaining is established by the law "On Protection of Personal Data";

6.3.2. request the correction or deletion of their personal data that is inaccurate, incomplete, outdated;

6.3.3. receive information about the personal data transfer to the third parties, except for the cases provided for by law;

6.3.4. withdraw consent to the personal data processing at any time;

6.3.5. require the Company to block or delete their personal data if it is illegally obtained or isn't necessary for the stated purpose of processing;

6.3.6. appeal against the Company's actions (inaction) and decisions that violate the rights of

personal data subjects by applying to the authorized state body in the order established by the legislation that regulates the procedure for dealing with applications from citizens and legal entities;  
6.3.7. require measures to be taken under the law to ensure the protection of data subject's rights.

## **7. Exercise of the rights of personal data subjects**

7.1. Confirmation of personal data processing, legal grounds and purposes of personal data processing, as well as other information specified in clauses 1 and 4 of Art. 11, paragraph 1 of Art. 12 of the Law on Personal Data are provided by the Company to the subject of personal data upon application form.

7.2. The information provided does not include personal data relating to other personal data subjects.

7.3. The application must contain:

- full name, permanent or temporary residence;
- date of birth;
- identification number or in the absence of a number, the number of the identity document of the personal data subject;
- personal data subject's request;
- personal signature or electronic digital signature;

The application can be sent in writing or in the form of an electronic document signed with an electronic digital signature in accordance with the legislation of the Republic of Belarus.

If the application form doesn't have all the necessary information in accordance with the requirements of the Personal Data Protection Law or the subject doesn't have the right to access the requested information, then a reasoned refusal is sent to them.

7.4. In accordance with paragraph 3 of Art. 11 of the Law on the Protection of Personal Data information may be withheld.

7.5. In the unlawful processing of personal data is confirmed upon the request, the Company blocks unlawfully processed personal data relating to this subject of personal data from the moment of such request.

7.6. If the personal data inaccuracy is confirmed, the Company clarifies (changes) the personal data within 15 days from the date of submission of such information and removes the personal data blocking.

7.7. If the unlawful personal data processing is confirmed, the Company blocks unlawfully processed personal data relating to this personal data subject from the moment of such a request or receipt of an application.

7.8. When the goals of processing personal data are achieved or when the personal data subject withdraws their consent, personal data must be deleted, unless otherwise provided by another agreement between the Company and the subject of personal data, or legislation.

## **8. Final clauses**

8.1. Other issues related to the personal data processing but not covered by this Policy are governed by the legislation of the Republic of Belarus.

8.2. The Company may make amendments or supplements to this Policy.