

APPROVED BY  
Order of the General Director of  
SFTUE “Belpetsvneshtekhnika”  
No. \_\_\_\_\_ dd. \_\_\_\_ .04.2022

Policy of SFTUE “Belpetsvneshtekhnika”  
regarding personal data processing

CHAPTER 1  
GENERAL PROVISIONS

1. Policy of SFTUE “Belpetsvneshtekhnika” regarding personal data processing (hereinafter – “the Policy”) determines the basic principles, purposes, conditions and methods of personal data processing, the lists of subjects and personal data processed at SFTUE “Belpetsvneshtekhnika”, as well as the functions of the Enterprise when personal data processing, the rights of the personal data subjects and the requirements applied to protection of personal data.
2. The Policy has been developed according to the requirements of the Constitution of the Republic of Belarus, legislative and other regulatory legal acts of the Republic of Belarus related to personal data.
3. The provisions of the Policy serve as the basis for development of local regulatory legal acts regulating processing by SFTUE “Belpetsvneshtekhnika” of personal data of the staff and other personal data subjects.

CHAPTER 2  
LEGISLATIVE AND OTHER REGULATORY LEGAL ACTS OF THE  
REPUBLIC OF BELARUS WHICH DETERMINE THE POLICY OF PERSONAL  
DATA PROCESSING

4. The Policy of SFTUE “Belpetsvneshtekhnika” regarding personal data processing is determined in compliance with the following regulatory legal acts:
  - The Constitution of the Republic of Belarus;
  - The Labor Code of the Republic of Belarus;
  - The Law of the Republic of Belarus dd. 07.05.2021 N 99-Z "On personal data protection" (hereinafter – “Law on personal data protection”);
  - The Law of the Republic of Belarus dd. 21.07.2008 N 418-Z "On the Population register”;
  - The Law of the Republic of Belarus dd. 10.11.2008 N 455-Z "On information,

informatization and data protection";

Other regulatory legal acts of the Republic of Belarus and regulations of the state authorities.

5. In order to implement the provisions of the Policy SFTUE "Belspetsvneshtekhnika" is making the following local regulatory legal acts and other documents.

6. The terms and their definitions in the said Policy have the meanings determined by the Law of the Republic of Belarus dd. May 7, 2021 r. N 99-Z "On personal data protection", the Law of the Republic of Belarus dd. November 10, 2008 N 455-Z "On information, informatization and data protection".

### CHAPTER 3 PRINCIPLES AND PURPOSES OF PERSONAL DATA PROCESSING

7. SFTUE "Belspetsvneshtekhnika" operates personal data and processes personal data of the staff of the Enterprise and other personal data subjects which are not in labor relationship with SFTUE "Belspetsvneshtekhnika".

8. Personal data shall be processed taking into account that it is necessary to ensure protection of the rights and freedoms of the staff of the Enterprise and other personal data subjects, including protection of the right to privacy, personal and family secrets, based on the following principles:

Personal data shall be processed on a legal and fair basis;

Personal data shall be processed in the volume corresponding to the declared purposes and shall ensure a fair balance of interests of all interested parties at all stages of such processing;

Personal data shall be processed with a consent of personal data subject, except for the cases stipulated by the legislative acts;

Personal data processing shall be limited to the achievement of specific, previously declared legitimate purposes. It is not allowed to process personal data that is incompatible with the initially stated processing purposes;

The contents and volume of the processed personal data shall correspond to the declared purposes. The processed personal data shall not be redundant to the declared purposes;

Personal data processing shall be transparent. The personal data subject shall be provided with the relevant data related to its personal data processing;

The operator shall take measures to ensure the accuracy and validity of the processed personal data and update the data if necessary;

Personal data shall be stored in a way allowing to identify a personal data subject which would take no longer than the stated purposes of personal data processing require.

9. Personal data shall be processed in order to:

ensure compliance with the Constitution of the Republic of Belarus, legislative and other regulatory legal acts of the Republic of Belarus, local legal acts of the Enterprise;

fulfill the functions, powers and obligations granted by the legislation of the Republic of Belarus to SFTUE "Belpetsvneshtekhnika", including provision of personal data to state authorities, to the Social Protection Fund of the Ministry of Labor and Social Protection of the Republic of Belarus, as well as to other state bodies;

regulate labor relations with the staff of the Enterprise (assistance in employment, training and promotion, ensuring personal security, monitoring the quantity and quality of work performed, ensuring the safety of property);

protect life, health or other vital interests of personal data subjects;

prepare, conclude, execute and terminate contracts with counterparties;

ensure access and internal facility order;

render temporary accommodation and catering services;

preparing reference materials for internal information support of the Enterprise;

execute judicial acts, acts of other bodies or officials subject to execution in accordance with the legislation of the Republic of Belarus on execution proceedings;

fulfill the rights and legitimate interests of SFTUE "Belpetsvneshtekhnika" when implementing activities stipulated by the Charter and other local legal acts of the Enterprise, or achieve socially significant goals;

other legal purposes.

#### CHAPTER 4

#### LIST OF THE SUBJECTS WHICH PERSONAL DATA SHALL BE PROCESSED

10. SFTUE "Belpetsvneshtekhnika" shall process personal data of the following subject categories:

employees of divisions and administration of the Enterprise, their relatives;

employees of subsidiaries and affiliates;

job candidates;

employees and other representatives of counterparties (legal entities and individuals);

consumers;

other personal data subjects (to ensure fulfillment of processing purposes specified in Chapter 3 of the Policy).

## CHAPTER 5 LIST OF PROCESSED PERSONAL DATA

11. The list of personal data processed at SFTUE "Belpetsvneshtekhnika" shall be determined in accordance with the legislation of the Republic of Belarus and local legal acts, taking into account the purposes of personal data processing specified in Chapter 3 of the Policy.

12. The Enterprise does not process special personal data related to race or nationality, political views, religious or other beliefs, health or intimate life, except for the cases stipulated by the legislation of the Republic of Belarus.

## CHAPTER 6 FUNCTIONS WHEN PROCESSING PERSONAL DATA

13. When processing personal data, SFTUE "Belpetsvneshtekhnika" shall:  
take measures necessary and sufficient to ensure compliance with the requirements of the legislation of the Republic of Belarus and local legal acts of the Enterprise related to personal data;

take legal, organizational and technical measures to protect personal data from unauthorized or accidental access to the data, destruction, modification, blocking, copying, provision, distribution of personal data, as well as from other illegal actions in relation to personal data;

appoint a person responsible for internal control over personal data processing;

appoint a division or a person responsible for technical protection of personal data;

introduce to the staff of the Enterprise directly involved in the personal data processing the provisions of the legislation of the Republic of Belarus and local legal acts related to personal data, including the requirements for protection of personal data;

issue or otherwise provide unrestricted access to this Policy;

inform personal data subjects or their representatives in accordance with the specified procedure about the availability of personal data related to the respective subjects, provide an opportunity to get familiarized with the personal data in case of requests from the specified personal data subjects or their representatives, unless otherwise stipulated by the legislation of the Republic Belarus;

terminate processing and destroy personal data in cases stipulated by the legislation of the Republic of Belarus related to personal data;

perform other actions stipulated by the legislation of the Republic of Belarus related to personal data.

## CHAPTER 7 TERMS AND CONDITIONS OF PERSONAL DATA PROCESSING

14. Personal data shall be processed under the consent of personal data subject to process its personal data, unless otherwise stipulated by the legislation of the Republic of Belarus related to personal data.

15. SFTUE "Belpetsvneshtekhnika" without the consent of personal data subject shall neither disclose nor distribute personal data to third parties, unless otherwise stipulated by the legislation of the Republic of Belarus.

16. The Enterprise has the right to entrust personal data processing on behalf of SFTUE "Belpetsvneshtekhnika" or in its interests to an authorized person on the basis of an agreement concluded with the authorized person. The agreement shall contain:

purposes for personal data processing;

a list of proceedings to be performed with personal data by an authorized person;

obligations to ensure confidentiality of personal data;

measures to ensure protection of personal data in accordance with Article 17 of the Law on Protection of Personal Data.

The authorized person is not obliged to obtain the consent of the personal data subject. If it is necessary to obtain the consent of the personal data subject for personal data processing on behalf of the Enterprise, such consent shall be received by SFTUE "Belpetsvneshtekhnika".

17. For the purpose of internal information support, SFTUE "Belpetsvneshtekhnika" can create internal reference materials, which, with the written consent of the personal data subject, unless otherwise stipulated by the legislation of the Republic of Belarus, shall include its last name, first name, patronymic, place of work, position, year and place of birth, address, subscriber number, e-mail address and other personal data reported by the personal data subject.

18. The access to personal data processed at SFTUE "Belpetsvneshtekhnika" shall be provided only to its staff allowed for personal data processing.

CHAPTER 8  
LIST OF PROCEEDINGS WITH PERSONAL  
DATA.  
PROCESSING METHODS

19. SFTUE "Belspetsvneshtekhnika" shall process personal data (any action or set of actions performed with personal data, including collection, systematization, storage, modification, use, depersonalization, blocking, distribution, provision, deletion).

20. Personal data shall be processed at the Enterprise by the following methods: using automation tools; without automation tools, if this provides for search of personal data and (or) access to personal data according to certain criteria (card indexes, lists, databases, logs, etc.).

CHAPTER 9  
TRANSFER OF PERSONAL DATA TO THIRD PARTIES

21. The transfer of personal data to third parties, including for commercial purposes, shall be allowed only under the consent of the subject or according to other legal grounds.

22. The transfer of data containing personal data shall be carried out in a way that provides protection from unauthorized access, destruction, modification, blocking, copying, distribution, as well as other illegal actions in relation to such data.

23. The transfer of personal data to third parties shall be prohibited if a required level of protection of the rights of personal data subjects is not provided on the territory of a foreign state, except when:

- the personal data subject has given its consent, provided that the personal data subject is informed about the risks arising from absence of a required protection level;
- personal data was obtained on the basis of an agreement concluded with the personal data subject, in order to perform actions specified by this agreement;
- personal data can be obtained by any person by a request in a case and in a manner specified by the law;
- such transfer is necessary to protect the life, health or other vital interests of the personal data subject or other persons, if obtaining the consent of the personal data subject is impossible;
- personal data is processed within implementation of international agreements of the Republic of Belarus;
- such transfer is carried out by the financial monitoring body in order to take measures on preventing legalization of income gained from crime, financing of terrorist activities and proliferation of mass destruction weapons in accordance with the law;
- the relevant permission has been received from the authorized body for protection of the rights of the personal data subjects.

## CHAPTER 10 RIGHTS OF PERSONAL DATA SUBJECTS

24. Personal data subjects have the right to:  
withdraw the consent of the personal data subject;  
obtain information regarding personal data processing and modifying personal data;  
demand to terminate personal data processing and (or) delete personal data;  
appeal against actions (inaction) and decisions of the operator related to personal data processing.

## CHAPTER 11 MEASURES TAKEN TO ENSURE PERFORMANCE OF THE OPERATOR'S OBLIGATIONS WHEN PERSONAL DATA PROCESSING

25. Measures necessary and sufficient to ensure that SFTUE "Belspetsvneshtekhnika" fulfills the obligations of the operator, stipulated by the legislation of the Republic of Belarus related to personal data, include:  
providing the personal data subjects with necessary information before obtaining their consent to personal data processing;  
explanation to the personal data subjects of their rights related to personal data processing;  
obtaining written consents of personal data subjects for processing of their personal data, except for cases stipulated by the legislation of the Republic of Belarus;  
appointing a person responsible for internal control over the personal data processing;  
issuing documents determining the Enterprise policy regarding the personal data processing;  
introducing provisions of the legislation on personal data to the staff directly involved in the personal data processing;  
introducing the procedure for access to personal data, including those processed in the information resource (system);  
technical and cryptographic protection of personal data in the order specified by the Operational and Analytical Center under the President of the Republic of Belarus, in accordance with the classification of information resources (systems) containing personal data (including appointing of a person responsible for technical protection of personal data);  
providing unrestricted access, including using the global computer network - the Internet, to the documents determining the Enterprise policy regarding personal data processing;  
termination of personal data processing in case of absence of the grounds for personal data processing;  
immediate notification of the authorized body for protection of the rights of personal data subjects about violations of personal data protection systems;  
modification, blocking, deleting false or illegally obtained personal data;  
limiting personal data processing by achieving specific, previously declared legitimate

purposes;  
storage of personal data in a form allowing to identify the personal data subjects, no longer than required by the stated purposes of personal data processing.

CHAPTER 12  
CONTROL OVER COMPLIANCE WITH THE LEGISLATION OF THE  
REPUBLIC OF BELARUS AND LOCAL LEGAL ACTS RELATED TO  
PERSONAL DATA, INCLUDING THE REQUIREMENTS FOR PERSONAL  
DATA PROTECTION

26. Control over compliance by the divisions of the Enterprise with the legislation of the Republic of Belarus and local legal acts related to personal data, including the requirements for personal data protection, shall be carried out in order to verify the compliance of processing of personal data in the divisions with the requirements of the legislation of the Republic of Belarus and relevant local legal acts, as well as the measures taken aimed at preventing and detecting violations of the legislation of the Republic of Belarus related to personal data, identifying possible channels of leakage and unauthorized access to personal data, and eliminating the consequences of such violations.

27. Internal control over compliance by the divisions of SFTUE "Belpetsvneshtekhnika" with the legislation of the Republic of Belarus and local legal acts related to personal data protection shall be carried out by an authorized person.

28. The arrangement of work with personal data in the divisions of the Enterprise shall be assigned to the respective heads of the said divisions.