

Ratified by director's order number
302 dated 08/11/2021 ____

POLICY OF PERSONAL DATA PROCESSING

1. POLICY DESIGNATION

1.1. This current document is made to provide the protection of personal data, rights and freedom of physical entities during personal data processing and forms the current policy of “2566 radioelectronic armament repair plant”, JSC (hereinafter – Company) in order to carry out the processing of personal data. Current policy of personal data processing is made in accordance with the law of the Republic of Belarus dated 10/11/2008 № 99-3 named “About personal data protection”, dated 10/11/2008 № 455-3 “About information, information system development and data protection” and exists in respect of all personal data, which are processed at the Company and can be received either from natural and legal entities (contractors), who are in legal relationships with the Company or from the entity, who is applied by the Company in accordance with labor legislature (hereinafter – employee).

1.2. Protection of Company’s interests is the aim of current policy, its partners, employees and web-site visitors, and also for observation of the legislature of the Republic of Belarus about personal data.

1.3. This policy covers the personal data which were received either before or after ratification of current policy.

1.4. The entities who transfer the personal data to the Company should be get acquainted with current policy.

1.5. Current policy amendment is being placed on the Company’s official web-site with no access restrictions.

2. GENERAL PROVISIONS

2.1. Sphere of policy implementation

2.1.1. Current policy covers the following aspect – protection of personal data processing, which can be done:

- in automatically mode;
- without automatic means in case of search providing of personal data and (or) access to it with certain parameters (card-indexes, lists, data bases, journals and other).

2.1.2. Current policy doesn’t cover the following cases which are connected with above-determined positions:

- for physical entities in the process of exclusively personal, family, home and other similar use, not related to the professional or entrepreneurial sphere;
- assigned in accordance with the established procedure to state secrets.

2.2. Terms, definitions and abbreviations

2.2.1. The following terms, definitions and abbreviations are used in the current Policy:

blocking of personal data - termination of access to personal data without deleting it;

processing of personal data - any action or set of actions performed with personal data, including collection, systematization, storage, modification, use, depersonalization, blocking, distribution, provision, deletion of personal data;

operator (Company) – “2566 radioelectronic armament repair plant”, JSC\$

personal data - any information relating to an identified individual or an identifiable individual;

provision of personal data - actions aimed at familiarizing with the personal data of a certain person or group of persons;

spread of personal data - actions aimed at familiarizing an indefinite number of persons with personal data;

subject of personal data - an individual in respect of whom personal data is processed;

cross-border transfer of personal data - transfer of personal data to the territory of a foreign state;

deletion of personal data - actions as a result of which it becomes impossible to restore personal data in information resources (systems) containing personal data and (or) as a result of which material media of personal data are destroyed;

authorized person - a state body, a legal entity of the Republic of Belarus, another organization, an individual who, in accordance with an act of legislation, a decision of a state body that is an operator, or on the basis of an agreement with an operator, processes personal data on behalf of the operator or in his interests;

2.3. Requirements of current policy is the obligatory for all company employees, which has the access to the personal data.

3. MAIN PRINCIPLES OF PERSONAL DATA PROCESSING

3.1. The processing of personal data is carried out by the operator in accordance with the principles established by the Law of the Republic of Belarus “About information, information system development and data protection” dated November 10, 2008 N 455-Z:

- processing of personal data is carried out on a legal and fair basis;
- the processing of personal data is limited to the achievement of specific, pre-defined and legitimate purposes. Processing of personal data that is incompatible with the purposes of collecting personal data is not permitted;
- it is not allowed to combine databases containing personal data, the processing of which is carried out for purposes incompatible with each other;
- only those personal data that meet the purposes of their processing are subject to processing.;
- the content and volume of personal data processed correspond to the stated purposes of processing. The personal data processed is not redundant in relation to the stated purposes of processing;
- when processing personal data, the accuracy of personal data, their sufficiency, and, where necessary, relevance in relation to the stated purposes of their processing is ensured;

- storage of personal data is carried out in a form that makes it possible to identify the subject of personal data no longer than required by the purposes of processing personal data, unless the period for storing personal data is established by law, an agreement to which the subject of personal data is a party, beneficiary or guarantor. The processed personal data is subject to destruction or depersonalization upon achievement of the processing goals or in the event of loss of the need to achieve these goals, unless otherwise provided by law.

3.2. The security of personal data in the Company is ensured by the implementation of agreed measures aimed at preventing (neutralizing) and eliminating threats to the security of personal data, minimizing possible damage, as well as measures to restore data and the operation of personal data information systems in the event of threats being realized.

4. PURPOSES OF PERSONAL DATA PROCCESSING

4.1. The operator processes personal data of employees, visitors to the Company's website, as well as personal data of other subjects of personal data received from contractors, necessary for the provision of services (performance of work), execution of an agreement or contract to which the subject of personal data is a party, beneficiary or guarantor.

4.2. Operator can use the information in the following cases:

4.2.1. Identification of sides in the frames of Company's contracts;

4.2.2. Communication with the subject if necessary, including sending notifications, information and requests related to the provision of services, as well as processing applications, requests and applications;

4.2.3. Improvement of service quality, which is fulfilled by the company;

4.2.4. Product, works and service promotion on the market with the help of direct communication with the subject of the personal data;

4.2.5. Conducting statistical and other studies based on anonymized data.

4.2.6. The company processes employee data necessary to fulfill the terms of the employment contract and exercise rights and obligations in accordance with labor legislation.

4.2.7. Compliance with the legislation of the Republic of Belarus, local regulations of the Company.

4.2.8. Achieving the goals outlined in the Company Charter.

4.3. The processing of personal data of visitors to the Company's website is carried out by obtaining their consent in the form of an electronic request: full name, address of place of residence (place of stay) and (or) place of study (work), email address or through a feedback form: full name, telephone number.

5. SUBJECTS OF PERSONAL DATA WHOSE PERSONAL DATA IS PROCESSED BY THE OPERATOR

5.1. The Company processes personal data of the following subjects of personal data:

– candidates for vacant positions (professions) - in the composition and within the time frame necessary for making a decision on concluding an employment contract and concluding an employment contract with the subject of personal data;

– employees of the Company and their relatives - in the composition and within the time frame necessary for maintaining personnel, accounting and tax records in accordance with the requirements of the legislation of the Republic of Belarus;

– counterparties (representatives of counterparties) under contracts of a civil nature - in the composition and within the time frame necessary for concluding contracts of a civil nature and fulfilling the terms of contracts of a civil nature, the party (representative) of which is the subject of personal data, as well as for maintaining accounting and tax accounting in accordance with requirements of the legislation of the Republic of Belarus;

– representatives of personal data subjects - in the composition and within the time frame necessary for interaction with the representative of the personal data subject on issues of the Company's activities or within its competence.

6. LIST OF PERSONAL DATA

6.1. Personal data includes the following:

6.1.1. Main personal data:

- Personal number;
- Surname, name, father's name (if it exists);
- sex;
- date of birth;
- place of birth;
- digital mug;
- citizenship detail;
- data on registration at the place of residence and (or) place of stay;
- data on the death or declaration of an individual as deceased, recognition as missing, incompetent, or with limited legal capacity.

6.1.2. Additional personal data:

- about parents, guardians, trustees, marital status, spouse, child (children) of an individual;
- about higher education, academic degree, academic title;
- about the type of occupation;
- about pensions, monthly insurance payments for compulsory insurance against industrial accidents and occupational diseases;
- about tax obligations;
- on the performance of military duty;
- about disability;
- on the existence of enforcement proceedings pending execution in the enforcement authorities.

7. ORDER AND CONDITIONS OF PERSONAL DATA PROCCESING

7.1. The processing of personal data is carried out by the Company in accordance with local regulations (internal procedures and policies) developed in accordance with the requirements of the legislation of the Republic of Belarus.

7.2. Processing of personal data is carried out with the consent of the subject of personal data, except for cases provided for by law.

7.3. Processing of personal data is carried out without the consent of the subject of personal data for the processing of his personal data in cases provided for by the legislation of the Republic of Belarus.

7.4. Processing of personal data without the consent of the subject of personal data can be carried out exclusively for the purposes established by the legislation of the Republic of Belarus.

7.5. The processing of personal data must be limited to the achievement of specific, pre-defined and legitimate purposes. Processing of personal data that is incompatible with the originally stated purposes of their processing is not permitted.

7.6. The content and volume of personal data processed must correspond to the stated purposes of their processing. The personal data processed should not be redundant in relation to the stated purposes of their processing.

7.7. When processing personal data, the accuracy of personal data, their sufficiency, and, where necessary, relevance in relation to the purposes of processing personal data must be ensured.

7.8. The processing of personal data must be transparent. For these purposes, the subject of personal data, in cases provided for by law, is provided with relevant information regarding the processing of his personal data.

7.9. If it is necessary to change the initially stated purposes of processing personal data, the operator is obliged to obtain the consent of the subject of personal data to process his personal data in accordance with the changed purposes of processing personal data in the absence of other grounds for such processing provided for by law.

7.10. Storage of personal data must be carried out in a form that allows identification of the subject of personal data, no longer than required by the stated purposes of processing personal data.

7.11. The operator is obliged to take measures to ensure the accuracy of the personal data he processes and, if necessary, update them.

7.12. The assignment of processing personal data to an authorized person is carried out by the operator on the basis of an agreement concluded between the Company and the authorized person, an act of legislation or a decision of a government body.

The agreement between the operator and the authorized person must define: the purposes of processing personal data; a list of actions that will be performed with personal data by an authorized person; obligations to maintain the

confidentiality of personal data; measures to ensure the protection of personal data in accordance with this Policy and the legislation of the Republic of Belarus.

7.13. In the event that the operator entrusts the processing of financial data to an authorized person, liability is to the subject of the financial data for the actions specified by the responsible person of the operator. The authorized person is responsible to the operator.

7.14. The authorized person is not required to obtain the consent of the subject of personal data. If the processing of personal data on behalf of the operator requires obtaining the consent of the subject of personal data, such consent is obtained by the operator.

8. RIGHTS AND RESPONSIBILITIES OF THE PERSONAL DATA OWNERS

8.1. Personal data owner has the right:

- to recall back the agree of personal data;
- to receive information regarding the processing of digital data and the modification of digital data;
- to receipt the information about the provision of official data to a third party;
- to demand processing of digital data and (or) their deletion;
- to appeal actions (no action) and operations of the operator related to the processing of medical data.

8.2. Operator must

- explain to the subject of personal data his rights related to the processing of personal data;
- obtain the agreement of the subject of personal data, except for cases provided for by law;
- provide protection of personal data during its processing;
- provide the subject of personal data with information about his personal data, as well as about the provision of his personal data to third parties, except in cases provided for by law;
- make changes to personal data that are incomplete, outdated or inaccurate, except in cases where a different procedure for making changes to personal data is established by legislative acts or if the purposes of processing personal data do not imply subsequent changes to such data;
- stop processing personal data, as well as delete or block it (ensure the termination of processing of personal data, as well as its deletion or blocking by an authorized person) in the absence of grounds for processing personal data provided for by law;
- notify the authorized body for the protection of the rights of personal data subjects about violations of personal data protection systems immediately, but no later than three working days after the operator becomes aware of such violations, except in cases provided for by the authorized body for the protection of the rights of personal data subjects;

- change, block or delete unreliable or illegally obtained personal data of the subject of personal data at the request of the authorized body for the protection of the rights of personal data subjects, unless another procedure for making changes to personal data, blocking or deleting them is not established by legislative acts;
- fulfill other requirements of the authorized body for the protection of the rights of personal data subjects to eliminate violations of the legislation on personal data;
- to carry out other duties, which are provided by the law.

9. PROCEDURE FOR CROSS-BORDER TRANSFER OF PERSONAL DATA

9.1. Cross-border transfer of personal data is prohibited if an adequate level of protection of the rights of personal data subjects is not ensured on the territory of a foreign state, except in cases when:

- the consent of the subject of personal data is given, provided that the subject of personal data is informed of the risks arising from the lack of an adequate level of protection;
- personal data was obtained on the basis of the contract concluded (to be concluded) with the subject of personal data in order to perform actions established by this contract;
- personal data can be obtained by any person by sending a request in cases and in the manner provided for by law;
- such transfer is necessary to protect the life, health or other vital interests of the subject of personal data or other persons, if obtaining the consent of the subject of personal data is impossible;
- processing of personal data is carried out within the framework of the implementation of international treaties of the Republic of Belarus;
- such transfer is carried out by the financial monitoring body in order to take measures to prevent the laundering of proceeds from crime, the financing of terrorist activities and the financing of the proliferation of weapons of mass destruction in accordance with the law;
- the appropriate permission has been received from the authorized body for the protection of the rights of personal data subjects.

9.2. The authorized body for the protection of the rights of personal data subjects determines the list of foreign states on whose territory the appropriate level of protection of the rights of personal data subjects is ensured.

10. PROCEDURE FOR SUBMITTING AN APPLICATION BY THE SUBJECT OF PERSONAL DATA TO THE OPERATOR

10.1. The subject of personal data to exercise the rights provided for in subclause 8.1. of this Policy, submits an application to the operator in writing or in the form of an electronic document. Legislative acts may provide for the mandatory personal presence of the subject of personal data and the presentation of

an identification document when submitting an application to the operator in writing.

10.2. The personal data subject's statement must contain:

- surname, first name, father's name (if any) of the subject of personal data, address of his place of residence (place of stay);
- identification number of the subject of personal data, in the absence of such a number - the number of the document identifying the subject of personal data, in cases where this information was indicated by the subject of personal data when giving his consent to the operator or the processing of personal data is carried out without the consent of the subject of personal data;
- statement of the essence of the requirements of the subject of personal data;
- personal signature or electronic digital signature of the subject of personal data.

10.3. The response to the application is sent to the subject of personal data in the form corresponding to the application form, unless otherwise indicated in the application itself.

11. MEASURES TO ENSURE THE SECURITY OF PERSONAL DATA DURING THEIR PROCESSING

11.1. When processing personal data, the Company takes the necessary legal, organizational and technical measures to protect personal data from unauthorized or accidental access to it, destruction, modification, blocking, copying, provision, distribution of personal data, as well as from other unlawful actions in relation to personal data.

11.2. Security insurance of personal data will be done in the following way:

- identifying threats to the security of personal data during their processing in personal data information systems;
- issuing local acts on the processing of personal data, as well as local acts establishing procedures aimed at preventing and identifying violations of the legislation of the Republic of Belarus, eliminating the consequences of such violations;
- appointment of a person responsible for internal control over the processing of personal data;
- application of organizational and technical measures to ensure the security of personal data during their processing in personal data information systems necessary to fulfill the requirements for the protection of personal data, the implementation of which ensures the levels of personal data security established by the President and the Government of the Republic of Belarus;
- estimation the effectiveness of measures taken to ensure the security of personal data before putting into operation the personal data information system;
- register of computing devices for storage of personal data;
- identification of facts of unauthorized access to personal data and drawing up appropriate measures;

- restoration of personal data modified or destroyed due to unauthorized access to it;
- - establishing rules for access to personal data processed in personal data information systems, as well as ensuring registration and accounting of all actions performed with personal data in personal data information systems;
- control over the measures taken to ensure the security of personal data and the level of security of personal data information systems.

12. FINAL POSITIONS

12.1. The operator's employees authorized to process personal data are prohibited:

12.1.1. Disclose information that is personal data to persons who do not have the right to access this information.

12.1.2. Make unrecorded copies of documents containing personal data.

12.1.3. Leaving documents containing personal data on desktops unattended.

12.1.4. Leave the premises without placing documents with personal data in locked cabinets/safes.

12.1.5. Remove documents containing personal data from the premises unless strictly necessary.

12.2. Control over the implementation of the provisions of this Policy is assigned to the person responsible for internal control over the processing of personal data.

12.3. For violation of the rules for processing personal data, their unlawful disclosure or distribution, the perpetrators bear disciplinary, administrative, and civil liability in accordance with the legislation of the Republic of Belarus.