

APPROVED
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Director
Radmetron Ltd.
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Radmetron Ltd. Personal Data Processing Policy

1. GENERAL PROVISIONS

1.1. The present Personal data processing policy of Radmetron Ltd. (hereinafter referred to as “the Policy”) has been developed pursuant to par.3 clause 3 article No. 17 of the Law on Personal Data Protection No.99-3 dated May 7th, 2021 (hereinafter referred to as “the Law on personal data protection”) and is aimed at protection of human and civil rights and liberties while processing one’s personal data, including but not limited to the right to privacy, personal and family secret.

1.2. The Policy is applicable to all personal data being processed by Radmetron Ltd. (hereinafter referred to as “the Company”, “the Operator”).

1.3. Existing legislative acts being amended, or other laws and regulations being adopted on the issues that are the subject to the Policy, such amendments, other laws and legislations should be considered governing prior to introducing corresponding amendments to the Policy.

1.4. The present Policy provisions provide a basis for the development of local legislative acts that regulate the issues of personal data processing, protection, privacy securing within the Company.

2. MAIN TERMS AND DEFINITIONS

2.1. **Automated personal data processing** – personal data processing via PC (automation);

2.2. **Biometric personal data** – biological and physiological characteristics of an individual with the aim of confirming a person's unique identity (fingerprints, palm vein patterns, iris, facial features and its image, etc.)

2.3. **Genetic personal data** – personal data relating to the inherited or acquired genetic characteristics of a natural person which give unique information about the physiology or the health of that natural person and which result, in particular, from an analysis of a biological sample from the natural person in question.

2.4. **Contracting party** – an individual or a legal entity, also individual entrepreneur, who enters into a binding agreement with another contracting party;

2.5. **Personal data processing** — any action or a series of actions performed towards personal data, including collection, systematization, storage, update and alteration, use, depersonalization, blocking, distribution, presentation, deleting of personal data;

2.6. **Operator** — an individual, who independently or jointly with other persons arranges and/or performs personal data processing, as well as defines the purposes of personal data processing, the volume of personal data subject to processing and actions (operations) performed towards personal data;

2.7. **Personal data** — any information related to a specified individual or to an individual that may be identified;

2.8. **Personal data presentation** — actions aimed at personal data disclosure to a certain person or a certain group of persons;

2.9. **Personal data distribution** - actions aimed at personal data disclosure to an uncertain person or an uncertain group of persons;

2.10. **Site**– radmetron.com and others;

2.11. **Services** – any services, products, programs, activities, support activities by the Company, including but not limited to rendering services via distance training systems;

2.12. **Special personal data** - personal data revealing racial or ethnic origin, political opinions, trade union membership, religious or philosophical beliefs, health or sexual life, administrative or criminal prosecution cases as well as genetic and biometric personal data.

2.13. **Personal data subject** – an individual who is subject to personal data processing;

2.14. **Competent authority** – National Center for personal data processing of the Republic of Belarus.

3. PRINCIPLES AND PURPOSES OF PERSONAL DATA PROCESSING

3.1. Personal data processing within the Company shall be implemented basing on the principles below, with the account of rights and freedoms protection of the personal data subjects, including right to privacy, personal and family secrets:

- personal data processing shall be implemented in a legitimate and equitable way;

- personal data processing shall be implemented in proportion to the processing purposes declared and shall guarantee equitable interests ratio of all involved parties at every stage of data processing;

- personal data shall be processed upon the consent of the personal data subject, unless required by law;

- personal data processing shall be limited to previously announced particular legitimate purposes. Personal data processing inconsistent with the originally stated processing purposes is not allowed;

- the scope and volume of personal data being processed shall meet the processing purposes being declared. Personal data processed shall not be excessive with respect to processing purposes being declared;

- personal data processing shall be transparent. Relevant information on his data processing shall be available to the personal data subject;

- necessary and sufficient measures shall be taken to ensure personal data protection from illegitimate (unauthorized or accidental) access to them, modification, blocking, copying, distribution, presentation, deletion as well any other illegitimate actions;

- personal data shall be stored in the form which allows the personal data subject to be identified no longer than it is required by their processing purposes;

- data processing purposes being achieved, or such purposes being no longer relevant, personal data shall be secured to destruction, unless otherwise required by the law of the Republic of Belarus.

3.2. Purposes of personal data processing within the Company:

- performance of functional duties of the Company as a legal entity: personnel, accounting and other records keeping, tax, accounting, statistical and other obligatory reporting by the Company;

- performance of functional duties of the Company on personal data submission to the Social Protection Fund by the Ministry of labor and social protection of the Republic of Belarus, state institutions and other organizations;

- labor relations legalization, rights enforcement and obligations performance under an employment agreement;

- sourcing, recruiting and assessment of candidates in the process of employment as well as other activities execution prior to employment;

- provision of additional guarantees and reimbursements to the Company's employees and their family members

- implementation of activities on training, private medical insurance, corporate and sport activities organization;

- civil agreements (deals) conclusion, modification and termination, performing obligations under a contract, such contracts inventory, arranging and exploitation of the contracting parties and their representatives' database;
- reference materials development including employees' personal mobile phone numbers, birthdates, photos to be placed in the Company's corporate portal;
- ensuring communication with personal data subjects, also through contact form on the Company's site and other Services;
- sending commercial offers as well as advertising and informational messages to the Company's site and other Services' users;
- implementation of advertising and marketing activities, including surveys and marketing research;
- execution of judicial acts, acts of state authorities and other institutions as well as of public officials subject to law on enforcement proceedings;
- other purposes subject to legal requirements.

4. CATEGORIES OF PERSONAL DATA SUBJECTS, LIST OF PERSONAL DATA PROCESSED

4.1. Content and volume of personal data processed shall fully meet the specified processing purposes, stated in chapter 3 of the Policy. Personal data processed shall not exceed the specified processing purposes.

4.2. The Operator processes personal data of the following subjects' categories:

- job applicants;
- the Company's employees, including former employees, their relatives
- employees and other representatives of legal entities – the Company contracting parties;
- individuals that are involved (are planned to be involved) in civil law relations with the Company;
- the Company sites and other Services' users;
- other personal data subjects when their personal data processing is required in the process of their intercommunication with the Company.

4.2.1. Personal data of job applicants include:

- full name (last name, first name, father's name);
- gender;
- citizenship;
- birthdate and birthplace;
- contact data;

- information on education, job experience, qualification;
- medical data (as provided by applicable law)
- other personal data, reported by a job applicant in his CV and accompanying letters.

4.2.2. Personal data of the Company employees and former employees include:

- full name (last name, first name, father's name);
- gender;
- citizenship;
- birthdate and birthplace;
- biometric personal data (photo);
- passport data;
- medical data (as provided by applicable law)
- registered address;
- residential address;
- contact data;
- information on education background, qualification, professional training and qualification upgrade;
- marital status, children, family relations;
- work experience, including information on incentives, awards and (or) disciplinary sanctions;
- data on marriage registration;
- military service details;
- data on physical disability;
- data on maintenance deduction;
- income details from the previous place of employment;
- other personal data provided by employees under labor legislation requirements.

4.2.3. Personal data of the employees' relatives include:

- full name;
- relation degree;
- year of birth;
- other personal data provided by employees under labor legislation requirements

4.2.4. Personal data of individuals that are involved (are planned to be involved) in civil law relations with the Company include:

- full name (last name, first name, father's name);
- birthdate and birthplace;
- passport data;
- registered address;
- contact data;
- information on bank account;
- other personal data provided by Contracting parties (individuals) required for contracts conclusion and execution.

4.2.5. Personal data of employees and other representatives of Contracting parties of the Operator (legal entities) include;

- full name (last name, first name, father's name);
- passport data;

- contact data;
- position occupied;
- other personal data provided by representatives (employees) of clients and contracting parties, required for contracts conclusion and execution;

4.2.6. Personal data of the Company sites and other Services' users include:

- data indicating last name, first name and father's name, telephone number, e-mail address, post address, other information required from an individual user;
- name of organization, legal and post address, bank details, taxpayer identification number, full name of an organization leader or of a person authorized for signing documents, telephone numbers – if a user is a legal entity.

Sites and other Services collect and process anonymized data of the visitors (including cookies files) using Internet-statistics services (Yandex.Metrika, Google Analytics and others).

The Company implements personal data processing within the term of user's exploitation of the Site and Services.

4.3. The Company does not process special personal data, revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, health or sexual life, except as required by the law of the Republic of Belarus.

5. PROCEDURE AND TERMS OF PERSONAL DATA PROCESSING

5.1. Personal data processing shall be carried out in accordance with the current legislation of the Republic of Belarus.

5.2. Personal data processing shall be implemented with the personal data subject consent for his data processing, or without such a consent in cases under the current legislation of the Republic of Belarus.

5.3. Personal data subject consent may be obtained in written form, as an electronic document or other electronic form.

5.4. The Company shall implement both automated and non-automated personal data processing.

5.5. Only the Company's employees whose professional duties include personal data processing shall be allowed to execute personal data processing.

5.6. The Company shall take all the necessary legal, organizational and technical measures to protect personal data from unauthorized and accidental access to such data, destruction, modification, blocking, distribution and other unauthorized activities, namely:

- shall define possible threat to the personal data safety while their processing;
- shall adopt local regulatory acts and other documents that govern the relations in the field of personal data processing and protection;
- shall appoint persons in charge of personal data safety provision in the Operator's divisions and informational systems;

- shall put in place the arrangements necessary to work with personal data;
- shall maintain documents records with personal data contained;
- shall manage information systems where personal data are processed;
- shall store personal data under conditions where their safety is guaranteed and unauthorized access to such data is excluded;
- shall arrange training for the Company employees in charge of personal data processing.

5.7. Personal data subject himself as well as persons providing the subject's personal data under the laws in force are the source of personal data obtaining.

5.8. The Company shall store personal data no longer than it is required by the personal data processing purposes, unless the period of personal data storage is determined under the laws of the Republic of Belarus, the contract.

5.9. Unless otherwise stipulated by the law, personal data processed shall be subject to destruction or depersonalization under the requirement of the personal data subject, when processing purposes are being achieved, their achievement becomes unnecessary, or their storage term has expired.

6. RIGHTS AND OBLIGATIONS OF THE PERSONAL DATA SUBJECT AND THE OPERATOR

6.1. The personal data subject has the right to:

- obtain information concerning his personal data processing;
- require his personal data validation/correction in case such data appear incomplete, out-of-date, inaccurate;
- obtain information on his personal data transfer to third parties free of charge not more often than once a year, unless otherwise required by the law of the Republic of Belarus;
- withdraw his consent for personal data processing any time without explaining the reasons by submitting the corresponding notification to the Operator;
- require from the Operator to terminate his personal data processing, including deleting, if there exist no more grounds for personal data processing presupposed by the Policy, the Law on personal data protection or other acts of law;
- appeal against the Company actions (inactions) and decisions, violating his rights while personal data processing to the competent authority on personal data subject rights protection – National Center for personal data processing of the Republic of Belarus under the current statutory procedure of the Law on Appeal of Citizens and Legal Entities.
- take other legal measures to protect his rights.

6.2. The personal data subject is obliged to:

- provide the Company with reliable and complete personal data;
- timely inform the Company of the cases of his personal data modification.

6.3. Information concerning the cases of personal data processing by the Company, legal grounds and purposes of personal data processing as well as other information concerning personal data processing is provided to the personal data subject by the Company after receiving a notification from the personal data subject. A notification from the personal data subject is also required for his personal data modification, the consent for personal data processing withdrawal and/or data deletion.

6.4. A notification of the personal data subject aimed at obtaining information on his personal data processing, his personal data modification, the consent for personal data processing withdrawal and/or data deletion should contain:

- last name, first name, father's name (if available) of the personal data subject, his registered address (residential address);
- personal data subject birthdate;
- personal data subject ID number (if available), in other cases – other identification document number of the personal data subject, provided this information has been indicated by the personal data subject while providing his consent to the Company, or if personal data processing is implemented without the personal data subject consent;
- personal data subject statement of the claim;
- personal data subject personal signature or digital signature.

6.5. Personal data subject notification may be submitted in written form, or as an electronic document with digital signature under the law of the Republic of Belarus.

6.6. In case the personal data subject notification does not contain all the information required (p. 6.4. of the Policy) or in case the subject does not have the right to access the information claimed, he is provided with reasoned refusal. The personal data subject may be refused providing information under p.3, article 11 of the Law on personal data protection.

6.7. Personal data related to other personal data subjects are not included among the information provided, unless there exist legal grounds for such personal data disclosure.

6.8. The Company has the right to:

- define in its own discretion the scope and list of measures that appear necessary and sufficient to ensure the duties performance as required by the Law on personal data protection and its subordinate legislation.

- entrust personal data processing to a third person, unless otherwise provided for by law;

- refuse personal data subject to satisfy his claim to cease his data processing and/or to delete them if the grounds for their processing exist under the Law of personal data protection and other legal acts.

- exercise other rights under the law of the Republic of Belarus in the sphere of personal data processing and protection.

6.9. The Company's obligations are:

- to organize personal data processing under the requirements of the Law on personal data protection;
- to explain to the personal data subject his rights in connection with personal data processing;
- to obtain the personal data subject's consent for personal data processing, unless otherwise required by law.
- to secure personal data protection while processing;
- to provide the personal data subject with the information concerning his personal data processing, as well as the cases of his personal information transfer to third parties and when such information transfer has been refused;
- to introduce modifications to the personal data being incomplete, out-of-date, inaccurate;
- to terminate personal data processing, implement their deleting and inform the personal data subject about the matter in case there are no grounds for further personal data processing under the present legal acts;
- to inform the competent authority for personal data subject rights protection on the security incidents within the personal data protection system, unless otherwise required by the competent authority for personal data subject rights protection;
- to implement modification, blocking or deleting of invalid or illegal personal data of the subject on the demand of the competent authority for personal data subject rights protection, unless a different procedure for personal data modification, blocking or deleting is required by legal acts;
- to fulfil other requirements of the competent authority for personal data subject rights protection to implement corrective actions to comply with personal data legal acts;
- to adopt all legal, organizational and technical measures to secure personal data from unauthorized or accidental access, modification, blocking, copying, distribution, presentation, deleting, as well as from other misconduct regarding personal data.
- to reply to personal data subjects' notifications and requests under the Law on personal data protection;
- to fulfil other obligations stipulated by the Law on personal data protection and other legal acts.

7. FINAL PROVISIONS

7.1. Pursuant to the p.4, article 17 of the Law on personal data protection, the present Policy is publicly available. Unlimited access to the Policy is secured by its being available on the site radmetron.com.

7.2. Individuals who have their data being processed in the Company may clarify the issues of their data processing by a written request to the following address: 112-3n, room 53, M.Bogdanovich str., 220040, Minsk, or to the e-mail: info@radmetron.com