

CANDIDATE PERSONAL DATA PROCESSING POLICY

GENERAL PROVISIONS.

1. The present Candidate Personal Data Processing Policy of JLLC "Belitsoft International" sets forth what information is collected by JLLC "Belitsoft International" as a data controller with regard to personal data subjects during the application or recruitment process.

2. The Policy explains to personal data subjects how and for which purposes their personal data is collected, used, or otherwise processed, and lays out the personal data subjects' rights in connection therewith and how they are realized.

3. The Policy is developed with due regard to the Law of the Republic of Belarus No. 99-3 "On the Protection of Personal Data" dated May 7, 2021.

BASIC TERMS AND DEFINITIONS WITHIN THIS POLICY.

1. Candidate — includes applicants and candidates involved in the application or recruitment process.

2. Personal data — any information pertaining to an identified or identifiable natural person.

3. Personal data subject — a natural person whose personal data is processed.

4. Data controller — a government authority, legal entity of the Republic of Belarus, other organization, or natural person, including a sole proprietor, that independently or jointly with the other specified persons processes personal data and (or) organizes the processing thereof.

PURPOSES FOR PROCESSING CANDIDATES' PERSONAL DATA WITHIN THIS POLICY.

1. Ensuring compliance with the legislation of the Republic of Belarus.
2. Reviewing candidates' resumes and recruiting for vacant positions.
3. Evaluating skills and qualifications for possible hiring.
4. Communicating with personal data subjects.
5. Keeping a database of candidates for filling vacant positions and creating a staff pool.

PERSONAL DATA PROCESSED WITHIN THIS POLICY.

1. surname, given name, patronymic;
2. date and place of birth;
3. education information;
4. employment information;
5. phone number;
6. email address, contact information on Skype and other messengers;
7. photograph;

8. and other personal data, including special personal data specified in the resume or application form, as well as all attachments.

BASIS FOR AND PROCEDURE OF PERSONAL DATA PROCESSING.

1. The basis for personal data processing is the consent of the personal data subject, save for cases specified in the legislation of the Republic of Belarus where personal data processing is carried out without obtaining said consent. The consent of the personal data subject constitutes a free, unambiguous, informed expression of their will through which they permit the processing of their personal data.

2. The data controller obtains the personal data in a verbal, written, or electronic form directly from personal data subjects, as well as publicly accessible sources.

3. The personal data obtained is entered into the documents or information systems of the data controller for further processing.

4. Personal data processing is carried out by staff whose job duties involve personal data processing.

5. When processing personal data, the data controller takes the necessary legal, managerial, and technical measures to protect the personal data from unauthorized or accidental access to it, its destruction, alteration, blocking, distribution, and other unauthorized operations.

6. The data controller stores the personal data for no longer than is necessary for the purposes of personal data processing, if the period for personal data storage isn't stipulated by the legislation of the Republic of Belarus or terms of the contract.

7. The conditions for termination of personal data processing include the following: achieving the purposes for personal data processing, expiration of the period for personal data processing, withdrawal of consent for personal data processing by the personal data subject, as well as detection of unauthorized personal data processing.

8. Consent for a candidate's personal data processing shall be kept for one year from the moment of employment application in accordance with the legislation of the Republic of Belarus.

RIGHTS OF THE PERSONAL DATA SUBJECT.

1. The personal data subject has the right to know what personal data is processed by the organization, the purpose and legal basis for the processing thereof, the processing period, as well as the source of the personal data.

2. The personal data subject has the right to demand that the data controller amend their personal data in case of it being incomplete, outdated, or inaccurate. For these purposes, the personal data subject files a written or electronic application to the data controller.

3. The personal data subject has the right to know about all the instances of the data controller disclosing the personal data to third parties that took place during the year preceding the date of filing the application.

4. The personal data subject has the right to demand that the data controller terminate the processing of their personal data, including its deletion, free of charge. In case the data controller has no obligation to store personal data, or the data controller has no other legal basis for personal data processing, the personal data shall be deleted (destroyed).

Should there be no technical capability for deleting the personal data, it shall be blocked, and its use shall be terminated.

5. The personal data subject has the right to, at any time and with no explanation, withdraw their consent via filing an application to the data controller in accordance with the established procedure, in a written or electronic form, or the form in which their consent was obtained.

6. The personal data subject has the right to appeal any action, inaction, or decision of the data controller that violates their rights in the course of personal data processing in the National Personal Data Protection Center of the Republic of Belarus.