

Approved by:
Order of General Director of SCHNEIDER GROUP OOO N.A. Shulzhenko, dd. January 31,2025 No. 3
Order of Director of SCHNEIDER GROUP Advisory S.A. Odintsov, dd. January 31,2025 No. 2

The Policy on the Processing of Personal Data

1. General provisions

This Policy on the processing of personal data (hereinafter – the '**Policy**') establishes the procedure for processing personal data in SCHNEIDER GROUP companies in Belarus:

- Limited liability company SCHNEIDER GROUP
- Limited liability company SCHNEIDER GROUP Advisory,

each of them is hereinafter referred to as the '**Operator**', in the process of personal data processing acts independently as an operator or an authorised person, independently exercises rights and bears responsibility under legislation of the Republic of Belarus and the Policy.

1.1. The Operator pays special attention to the protection of personal data during their processing and respects the execution of rights of personal data subjects.

The Policy is developed in accordance with the requirements of the Law of the Republic of Belarus dd. 07.05.2021 No. 99-3 'On Personal Data Protection' (hereinafter - 'the **Law**') and is one of the measures taken by the Operator to protect personal data stipulated by Article 17 of the Law.

1.2. The Policy explains to personal data subjects how and for what purposes data is collected, used or otherwise processed, as well as reflects the rights of personal data subjects in this regard and the mechanism for exercising them.

The Policy does not apply to the processing of personal data in the course of labour activity and administrative procedures in relation to current and former employees, as well as users of the website in terms of cookies.

1.3. The Policy applies to the relations in the field of personal data processing arising for the Operator both before and after the approval of the Policy.

1.4. The Policy uses the following terms and definitions stipulated by the Law:

- **personal data:** any information relating to an identified or identifiable natural person
- **personal data subject:** a natural person whose personal data is processed
- **personal data operator:** a state authority, legal entity of the Republic of Belarus, other organisation, natural person, including an individual entrepreneur, independently or jointly with other specified persons organising and (or) carrying out processing of personal data
- **processing of personal data:** any action (operation) or set of actions (operations) with personal data performed with or without the use of automation tools. Processing of personal data includes (but not limited to) collection, systematisation, storage, modification, use, depersonalisation, blocking, dissemination, provision, and deletion
- **dissemination of personal data:** actions aimed at familiarising with personal data of an indefinite number of persons
- **provision of personal data:** actions aimed at familiarisation with personal data of a certain person(s)
- **blocking of personal data:** termination of access to personal data without deleting them
- **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 carriers of personal data are destroyed
- **depersonalisation of personal data:** actions, as a result of which it becomes impossible to determine the belonging of personal data to a particular personal data subject without using additional information.

1.5. Personal data may be used by the Operator for scientific or other research purposes after obligatory anonymisation of such personal data, in particular, for preparation and publication of reports on its activities, preparation and implementation of publications and speeches related to the performance by the company's employees of their job duties.

1.6. The Operator processes only those personal data that are necessary for fulfilment of the stated purposes and does not allow their excessive processing.

1.7. The Operator's postal address:

SCHNEIDER GROUP OOO: ul. Surganova 29, prem. 1 room 2, Minsk, Republic of Belarus, 220012.

SCHNEIDER GROUP Advisory OOO: ul. Surganova 29, prem. 1 room 2, Minsk, Republic of Belarus, 2200124.

Internet address: <https://schneider-group.com/ru/about/contacts/minsk/>

2. Purposes and legal basis of personal data processing by the Operator

2.1. Processing of personal data is carried out to ensure the protection of rights and freedoms of personal data subjects, including privacy, personal and family secrecy and is limited to the achievement of specific, predetermined and legitimate purposes. Processing of personal data which is inconsistent with the purposes of personal data collection is not allowed.

2.2. Only personal data that meet the purposes for which they are processed shall be processed.

2.3. Processing of personal data by the Operator is carried out for the following purposes:

- Responding to requests of personal data subjects submitted to the Operator via the form on the website
- Provision of services related to the Operator's core business, conclusion, amendment, execution, and cancellation of civil law contracts
- Recruiting candidates for the Operator's vacant positions, the Operator's clients
- Informing about the Operator's events and services, including by sending information and advertising materials, ensuring participation in events through registration.

2.4. The legal basis for personal data processing shall be the consent of the personal data subject, except in cases established by legislation of the Republic of Belarus, when personal data processing is carried out without obtaining such consent and pursuant to other legal grounds.

2.5. The consent of the personal data subject must be a free, unambiguous, and informed expression of his (her) will by which he (she) authorises the processing of his (her) personal data. The consent of the personal data subject may be obtained in writing, in the form of an e-document or in other e-form.

3. Categories of personal data subjects, list of processed personal data, legal grounds and terms of personal data processing

3.1. The Operator processes personal data for the purposes, to the extent, on legal grounds and within the timeframes applicable to each category of personal data subjects as follows:

Purpose of processing	Category of subject	Volume of personal data	Legal grounds for processing	Storage period of personal data
Responses to requests received via the form on the website	Person who submitted the request	Full name, company (if any), telephone number, e-mail address, other data specified by the person in the request	Consent of the personal data subject (art. 5 of the Law)	2 months from the date of response to the request
Processing of requests	Applicant	Full name, company (if any), telephone number, e-mail address, other data specified by the person in the request	Processing of personal data without the personal data subject's consent in cases when it is required for the fulfilment of duties (powers) provided for by legislative acts (art. 6, par. 20 of the Law)	5 years
Provision of services, conclusion, execution, amendment, cancellation of civil law contracts	Person authorised to sign contracts	Data provided by the client upon conclusion, execution of the contract	Processing of personal data without the consent of the personal data subject: when receiving personal data on the basis of a contract, with the personal data subject, in order to	Agreements, contracts and documents thereto - 3 years after the expiry date, tax authorities' audit of tax compliance. If no audit was conducted - 10 years after the expiry date. (cl. 70 of the List ¹)

¹ Resolution of the Ministry of Justice of the Republic of Belarus No. 140 dd. 24.05.2012 'On the List of Standard Documents' (List)

Purpose of processing	Category of subject	Volume of personal data	Legal grounds for processing	Storage period of personal data
			perform actions thereunder, in cases when the processing of personal data is necessary for the fulfilment of obligations (powers) stipulated by legislative acts. (par. 15, 20 art. 6 of the Law)	
Recruiting candidates for vacant positions of the Operator, the Operator's clients	Person who sent the application (CV)	Full name, e-mail address, telephone number. Information on the education. Other data specified in the application (CV)	Consent of the personal data subject (art. 5 of the Law)	For unemployed candidates - 1 year (cl. 680 of the List)
Informing about the Operator's events and services, including by mailing information and promotional materials, ensuring participation in events by registering for them	Person registered for the event	Full name, company (if any), telephone number, e-mail address, other data specified by the person in the comments during registration	Consent of the personal data subject (art. 5 of the Law)	2 months from the date of response to the request

4. Authorised persons. Cross-border transfer of personal data

4.1. To achieve the purposes of personal data processing, the Operator may transfer personal data to authorised persons. Transfer of personal data to authorised persons is made on the basis of agreements with the Operator and in cases directly provided for by the legislation.

4.2. Cross-border transfer of processed personal data is carried out by the Operator only to countries where an adequate level of protection of the rights of personal data subjects is ensured and only to achieve the stated processing purposes.

4.3. In case of necessity of cross-border transfer of personal data to the countries where the adequate level of protection of the rights of personal data subjects is not ensured, the Operator is entitled to carry out such transfer in the cases provided for by Article 9 of the Law, including when:

- The consent of the personal data subject is given, provided that the personal data subject is informed of the risks arising from the lack of an adequate level of protection of personal data
- Posting information about their activities in the global computer network Internet
- The processing of personal data is necessary for the fulfilment of duties (powers) stipulated by legislative acts.

5. Rights of personal data subjects

5.1. The personal data subject has the right to:

5.1.1. Withdraw his (her) consent, if it has been obtained for the processing of personal data by the Operator. The right to withdraw consent cannot be exercised, if the personal data processing by the Operator is carried out on other legal grounds established by the Law, in particular on the basis of an agreement with the personal data subject.

5.1.2. Receive information concerning the processing of his (her) personal data by the Operator, containing:

- the Operator's name and location
- confirmation of the fact of the applicant's personal data processing by the Operator
- personal data and the source of their obtaining
- legal grounds and purposes of personal data processing
- the term for which consent is given in cases when personal data processing is carried out on the basis of personal data subject's consent
- the name and location of the Operator's authorised person
other information provided for by the legislation.

5.1.3. Request the Operator to amend his (her) personal data, if the personal data is incomplete, outdated or inaccurate. For this purpose, the personal data subject shall attach relevant documents and (or) duly certified copies thereof, confirming the need to make changes to the personal data.

5.1.4. Receive information from the Operator about the provision of his (her) personal data to third parties. Information is provided free of charge once a calendar year, unless otherwise provided by the Law and other legislative acts.

5.1.5. Request from the Operator to stop processing his (her) personal data, including deletion thereof, free of charge, if there are no grounds for processing of personal data provided for by the Law and other legislative acts.

5.1.6. Appeal against actions (inaction) and decisions of the Operator that violate his (her) rights in the processing of personal data in accordance with the procedure established by the legislation.

5.2. In order to exercise his (her) rights related to the processing of personal data, the personal data subject submits a request to the Operator in writing to the postal address specified in sub-cl. 1.7 cl. 1 hereof, or as an e-document or in e-form to the following e-mail address: minsk@schneider-group.com.

The request of the personal data subject shall contain his (her):

- surname, first name, patronymic, residence address (place of stay)
- date of birth
- description of the essence of the request
- identification number (number of the identity document), if this information was indicated when giving consent or personal data processing is carried out without the consent
- personal signature or electronic digital signature.

5.3. The term of response to the personal data subject's request shall be 5 business days from the date of receipt by the Operator of the request in case of receipt of the request for information regarding the processing of the applicant's personal data by the Operator, and 15 business days from the date of receipt by the Operator of the personal data subject's request in other cases.

6. Final provisions

6.1. Any issues related to the processing of personal data not covered by the Policy shall be regulated by legislation of the Republic of Belarus.

6.2. If any provision of the Policy is deemed to be contrary to the legislation, the remaining provisions complying with the legislation shall remain in force and valid and any invalid provision shall be deemed to be deleted / amended to the extent necessary to make it compliant with the legislation.

6.3. The Operator has the right at its own discretion to unilaterally change and (or) supplement the terms of the Policy without prior notice to personal data subjects by posting a new version of the Policy on the web-site.