

APPROVED BY
Director of
BFB Capital LLC
«15» November 2021

PERSONAL DATA PROCESSING POLICY

1. General Provisions

1.1 This policy of BFB Capital Limited Liability Company (hereinafter referred to as the Policy) has been developed on the basis of:

The Constitution of the Republic of Belarus;

The Law of the Republic of Belarus dated 07.05.2021 No. 99-Z "On the protection of personal data" (hereinafter-Law No. 99-Z);

The Law of the Republic of Belarus dated July 21, 2008 No. 418-3 "On the population register";

The Law of the Republic of Belarus dated November 10, 2008 No. 455-3 "On Information, Informatization and Information Protection";

the other regulatory legal acts of the Republic of Belarus and local legal acts of BFB Capital LLC, regulating the processing of personal data of individuals in BFB Capital LLC.

1.2 The Policy defines the basic principles, goals, conditions and methods of personal data processing, lists of subjects and personal data processed in BFB Capital LLC, functions of BFB Capital LLC in the processing of personal data, rights of personal data subjects, as well as implemented in LLC "BFB Capital" requirements for the protection of personal data.

1.3 In pursuance of the requirements of clause 4 of Art. 17 of the Law No. 99-3 The Policy is published freely on the global Internet on the official website of BFB Capital LLC www.bfb.by and applies to all personal data processed by BFB Capital LLC.

1.4 For the purposes of this Policy, the following terms and their definitions are used:

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;

publicly available personal data - personal data disseminated by the subject of personal data either with his consent or disseminated in accordance with the requirements of legislative acts;

personal data processing operator - LLC BFB Capital, UNP 193023796, location: 220030, Minsk, st. Internatsional'naya, 25a-24, room 22;

personal data - any information relating to an identified natural person or natural person who can be identified;

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

dissemination of personal data - actions aimed at familiarizing with the personal data of an indefinite circle of persons;

personal data subject - an individual in respect of whom the processing of personal data is carried out;

deletion of personal data - actions as a result of which it becomes impossible to restore the

content of personal data in the information system of personal data and (or) as a result of which material carriers of personal data are destroyed;
blocking of personal data - termination of access to personal data without deleting it. Other terms and definitions not specified in this paragraph are used in the meanings specified in the Law No. 99-3.

2. Principles and purposes of personal data processing

2.1 The processing of personal data in BFB Capital LLC is carried out taking into account the need to ensure the protection of the rights and freedoms of personal data subjects, including the protection of the right to privacy, personal and family secrets, based on the following principles:

the processing of personal data is carried out on a legal and fair basis;

processing of personal data is carried out in proportion to the stated purposes of their processing and ensures a fair balance of interests of all interested parties at all stages of such processing;

processing of personal data is carried out with the consent of the subject of personal data, with the exception of cases provided for by legislative acts;

the processing of personal data is limited to the achievement of specific, predetermined legitimate goals. Processing of personal data that is incompatible with the originally stated purposes of their processing is not allowed;

the content and volume of processed personal data correspond to the stated purposes of their processing. The processed personal data are not redundant in relation to the stated purposes of their processing;

the processing of personal data is transparent. The subject of personal data may be provided with relevant information regarding the processing of his personal data;

LLC "BFB Capital" takes measures to ensure the accuracy of the personal data processed by it, if necessary, updates them;

to quote the subject of personal data no longer than the stated purposes of the processing of personal data require.

2.2 Personal data is processed by LLC "personal data storage is carried out in a form that allows identifying BFB Capital" in order to:

conclusion and execution (if necessary - also changes and termination) with the subject of personal data of any transactions and their further execution;

BFB Capital LLC holding shares, surveys, research, and other similar events;

providing the personal data subject with information about the services provided by BFB Capital LLC (operations performed);

conducting personnel work and organizing accounting of employees of LLC "BFB Capital" involving and selecting candidates for work at BFB Capital LLC;

regulation of labor and other relations directly related to them;

formation and provision of statistical and management reporting in accordance with the requirements of the legislation;

provision of information to authorized state bodies in cases established by law;

implementation of administrative and economic activities by LLC "BFB Capital";

3. Conditions and methods of processing personal data

3.1 The processing of personal data in BFB Capital LLC is carried out after obtaining the consent of the subjects of personal data to the processing of their personal data, as well as without obtaining consent in cases stipulated by the legislation of the Republic of Belarus.

The consent of the subject of personal data is not required in the following cases:

for the administration of justice, the execution of court orders and other executive documents;

in the implementation of legislation on the prevention of legalization of proceeds from crime, financing of terrorist activities and financing the proliferation of weapons of mass destruction;

upon receipt of personal data of BFB Capital LLC on the basis of an agreement concluded with the subject of personal data, in order to perform the actions established by this agreement;

when processing personal data, when they are indicated in a document addressed to BFB Capital LLC and signed by the subject of personal data, in accordance with the content of such a document;

in cases where the processing of personal data is necessary to fulfill the duties (powers) provided for by legislative acts;

in other cases provided for by Article 6 of the Law No. 99-3 and other legislation on personal data.

3.2 BFB Capital LLC carries out both automated and non-automated processing of personal data.

3.3 Employees of BFB Capital LLC are allowed to process personal data, whose job responsibilities include processing personal data and in compliance with the principles of personal responsibility.

3.4 The processing of personal data is carried out by:

receiving personal data orally and in writing directly from the subjects of personal data (their authorized representatives);

obtaining personal data from publicly available sources;

entering personal data into journals, registers and information systems of BFB Capital LLC;

using other methods of processing personal data.

3.5 It is not allowed to disclose to third parties and disseminate personal data without the consent of the subject of personal data, unless otherwise provided by law.

3.6 The transfer of personal data to authorized state bodies and organizations is carried out in accordance with the requirements of the legislation.

3.7 LLC "BFB Capital" has the right to entrust the processing of personal data to another person with the consent of the subject of personal data, unless otherwise provided by law. Such processing of personal data is carried out only on the basis of an agreement concluded between LLC "BFB Capital" and a third party, which must define: a list of actions (operations) with personal data that will be performed by a third party processing personal data; the purposes of personal data processing; obligations of a third party to respect the confidentiality of personal data and ensure their security during processing, as well as requirements for the protection of processed personal data.

Responsibility to the subject of personal data for the actions of persons to whom LLC “BFB Capital” entrusts the processing of personal data of the subject of personal data is borne by LLC “BFB Capital”.

3.8 The processing of personal data stops when the goals of such processing are achieved, as well as after the expiration of the period provided for by law, the contract or the consent of the subject of personal data to the processing of his personal data.

If the subject of personal data revokes his consent to the processing of his personal data, BFB Capital LLC has the right to continue processing personal data without the consent of the subject of personal data, if such processing does not contradict the law.

3.9 BFB Capital LLC takes the necessary legal, organizational and technical measures to protect personal data from unauthorized access to them, destruction, alteration, blocking, distribution and other unauthorized actions, including:

identifies threats to the security of personal data during their processing;

adopts local legal acts and other documents regulating relations in the field of processing and protection of personal data;

appoints a structural unit or a person responsible for internal control over the processing of personal data at BFB Capital LLC;

creates the necessary conditions for working with personal data;

organizes work with information systems in which personal data are processed;

stores personal data in conditions under which their safety is ensured and unlawful access to them is excluded;

familiarizes the employees of BFB Capital LLC, who directly process personal data, with the provisions of the legislation of the Republic of Belarus on personal data, including the requirements for the protection of personal data, documents defining the policy of BFB Capital LLC regarding the processing of personal data, local legal acts of BFB Capital LLC on the processing of personal data;

organizes training for BFB Capital LLC employees who process personal data.

3.10 LLC “BFB Capital” stores personal data no longer than required by the purpose of processing personal data, if the storage period for personal data is not established by the legislation of the Republic of Belarus, by an agreement.

4. The volume and categories of processed personal data, categories of personal data subjects

4.1 BFB Capital LLC can process personal data of the following categories of personal data subjects:

individuals who are candidates for employment at BFB Capital LLC;

individuals who are employees of BFB Capital LLC and their close relatives;

individuals who are former employees of BFB Capital LLC;

individuals - clients of BFB Capital LLC (their representatives) and other participants in financial transactions carried out by BFB Capital LLC;

individuals - users of information resources (systems) owned by BFB Capital LLC (company websites, virtual personal account of BFB Capital LLC, etc.);

individuals - visitors of BFB Capital LLC;

individuals who are not clients who intend to conclude contractual relations with BFB

Capital LLC;

individuals whose personal data have been made publicly available by them, and their processing does not violate their rights and legitimate interests and complies with the requirements established by the legislation on personal data;

other individuals who have agreed to the processing of their personal data by BFB Capital LLC, or individuals whose personal data processing is necessary for BFB Capital LLC to achieve the goals stipulated by the agreement concluded with the subject of personal data and the legislation of the Republic of Belarus;

4.2 BSE Capital LLC may process the following personal data of the subjects of personal data specified in clause 4.1 of this Policy:

surname, name, patronymic (if any);

sex;

citizenship;

Date and place of birth;

image (photograph);

data of the identity document, incl. an identification number;

registration address at the place of residence;

address of the actual residence;

contact details, including telephone number, email address, etc.;

information about the electronic profile (including the IP address; type of device; type of browser; information about the interaction of the device of the personal data subject with the information resources of BFB Capital LLC; cookies, including visited pages and clicks on links, if the subject's browser is personal data allows their receipt; information about the application used by the subject of personal data for sending instructions/orders);

information about bank accounts;

individual taxpayer number;

information about education, qualifications, professional training and advanced training;

marital status, having children, family ties;

information about labor activity, including the place of work, position held, income, length of service, the availability of incentives, awards and (or) disciplinary sanctions;

marriage registration data;

information about military registration;

information about disability;

information about the withholding of alimony;

information about credit transactions;

information about bringing to administrative/criminal liability;

information about organizations, the decision-making of which an individual directly and/or indirectly (through other persons and/or other organizations) influences;

other personal data provided by the subject of personal data in accordance with the requirements of the law.

Guided by the principles set forth in clause 2.1 of this Policy, BFB Capital LLC processes the subject's personal data only to the extent that is proportionate to the stated purposes of their processing and ensures a fair balance of interests of all interested parties at all stages of such processing.

4.3 LLC “BFB Capital” does not process special personal data concerning race, nationality, political views, religious or philosophical beliefs, health status, intimate life, except as otherwise provided by law.

5 Operator functions when processing personal data

5.1 LLC "BFB Capital" when processing personal data:

takes measures necessary and sufficient to ensure compliance with the requirements of legislation and local legal acts of BFB Capital LLC in the field of personal data;
takes legal, organizational and technical measures to protect personal data from unauthorized access to them, destruction, alteration, blocking, copying, provision, distribution of personal data, as well as from other illegal actions in relation to personal data;
appoints a structural unit or a person responsible for the implementation of internal control over the processing of personal data;
issues local legal acts defining the policy and issues of processing and protecting personal data at BFB Capital LLC;
familiarizes the employees of BFB Capital LLC, who directly process personal data, with the provisions of the legislation and local legal acts of BFB Capital LLC in the field of personal data, including the requirements for the protection of personal data, and training these employees;
provides unrestricted access to this Policy by posting it on the global computer network Internet on the official website of BFB Capital LLC at the email address: www.bfb.by;
publishes or otherwise provides unrestricted access to this Policy;
provides in the prescribed manner to the subjects of personal data or their representatives information about his personal data relating to the relevant subjects, provides an opportunity to familiarize himself with these personal data when contacting and (or) receiving requests from these subjects of personal data or their representatives, unless otherwise provided by the legislation of the Republic of Belarus;
stops processing, as well as deletes or blocks personal data in the absence of grounds for their processing, provided for by the Law No. 99-3 and other legislative acts;
performs other actions and obligations stipulated by the legislation of the Republic of Belarus in the field of personal data.

6 Rights of subjects of personal data and the operator

6.1 Personal data subjects have the right to:

obtaining information regarding the processing of his personal data, and changing his personal data, with the exception of cases provided for by law. The information is provided to the subject of personal data in an accessible form, and it should not contain personal data relating to other subjects of personal data, unless there are legal grounds for disclosing such personal data. The list of information and the procedure for obtaining it is established by the Law No. 99-3;
receiving information about the provision of your personal data to third parties once a calendar year free of charge, unless otherwise provided by the Law No. 99-3 and other legislative acts;
the requirement to terminate the processing of personal data and (or) their deletion in the

absence of grounds for the processing of personal data provided for by the Law No. 99-3 and other legislative acts;

appeal against actions (inaction) and decisions of BFB Capital LLC related to the processing of personal data.

other rights provided for by the Law No. 99-3 and other acts of legislation.

6.2 BFB Capital LLC has the right to:

process the personal data of the subject of personal data in accordance with the stated purpose;

demand from the subject of personal data to provide reliable personal data necessary for the execution of the contract, identification of the subject of personal data, as well as in other cases stipulated by the legislation on personal data;

process publicly available personal data of individuals;

to process personal data subject to publication or mandatory disclosure in accordance with the legislation of the Republic of Belarus;

entrust the processing of personal data to a third party with the consent of the subject of personal data, subject to legal guarantees of effective means of protection from a third party;

carry out other actions provided for by the Law No. 99-3 and other acts of legislation.

7 Control

7.1 Control over the implementation of the legislation and local legal acts in the field of personal data protection by the structural divisions of BFB Capital LLC is carried out in order to verify the compliance of the processing of personal data in the structural divisions of BFB Capital LLC with the legislation and local legal acts of BFB Capital LLC in the field of personal data protection. data, as well as measures taken to prevent and identify violations of legislation in the field of personal data protection, identify possible channels of leakage and unauthorized access to personal data, eliminate the consequences of such violations.

7.2 Internal control over the compliance by the structural units of BFB Capital LLC with the legislation of the Republic of Belarus and local legal acts of BFB Capital LLC in the field of personal data protection is carried out by the person responsible for internal control over the processing of personal data at BFB Capital LLC.

7.3 Personal responsibility for compliance with the requirements of legislation and local legal acts of BFB Capital LLC in the field of personal data in the structural divisions of BFB Capital LLC, as well as for ensuring the confidentiality and security of personal data in the divisions of BFB Capital LLC rests with their managers.

8 Final provisions

8.1 For violation of the requirements of this Policy or other local legal acts of BFB Capital LLC, adopted in the development of its provisions, including those related to non-compliance with the principles and conditions for processing personal data of individuals, as well as for disclosure or illegal use of personal data of BFB Capital LLC and its employees are liable in accordance with the legislation of the Republic of Belarus.

8.2 This Policy comes into force from the moment it is approved by the authorized body of



220030, Minsk, Internatsional'naya st., 25a-24, of. 22
+375 (17) 343-69-81; www.bfb.by
info@bfb.by

BFB Capital LLC and is posted on its official website, unless another date for the entry into force of the amendments is additionally determined by BFB Capital LLC upon such placement.