

Data Processing Policy

1. General Provisions

1.1. This Data Processing Policy (hereinafter referred to as the "Policy") has been developed by LLC "FINISTRA" in fulfillment of the requirements of Article 17, Paragraph 3, of the Law of the Republic of Belarus dated May 7, 2021, No. 99-Z "On Personal Data Protection" (hereinafter referred to as the "Law") for the purpose of safeguarding the rights and freedoms of individuals when processing their personal data, including the protection of the rights to privacy, personal, and family secrets.

1.2. The Policy serves as a fundamental local regulatory document that defines the policy of LLC "FINISTRA" regarding the processing and security of personal data, the purposes, composition of personal data, and the procedure for their processing, measures aimed at protecting personal data, as well as procedures aimed at identifying and preventing violations of the legislation of the Republic of Belarus in the field of personal data.

1.3. The Policy applies to the processing of personal data obtained from individuals specified in paragraph 6 of this Policy by LLC "FINISTRA" (hereinafter referred to as the "Operator") and is mandatory for implementation by all employees of the Organization who process personal data in accordance with their job responsibilities.

1.4. In compliance with the requirements of Article 17, Paragraph 4, of the Law, the Policy is made publicly accessible on the Internet on the Operator's website at www.printplace.by.

2. Key Terms and Their Definitions

- Automated processing of personal data - the processing of personal data using computer technology;
- Client - an individual, including an individual entrepreneur, or a legal entity that has entered into a contract for the execution of printing and post-printing, as well as other works with the Organization.

Other terms used in the Policy are used in the meaning specified in the Law.

3. Legal Bases for Processing Personal Data

3.1. The legal basis for processing personal data is the consent of the personal data subject.

3.2. The Operator has the right to process personal data without the consent of the personal data subject in cases where:

- The processing is necessary for the conclusion of a contract with the personal data subject or for the performance of contractual obligations by the Operator to the personal data subject;
- The processing of personal data is carried out for data placed in publicly available sources, including data to which access is provided to an unlimited circle of individuals through distribution;
- The processing of personal data is necessary to fulfill duties (powers) provided by legislative acts.

4. Purposes of Personal Data Processing

4.1. The processing of personal data is limited to achieving specific, predetermined, and lawful purposes. Processing of personal data that is incompatible with the purposes of data collection is not allowed.

4.2. Only personal data that corresponds to the purposes of their processing shall be subject to processing.

4.3. The Operator processes personal data for the following purposes:

- Execution of printing and post-printing works, including copying, printing, brochuring, document finishing, as well as computer-related tasks.
- Provision of reference and information services to customers.
- Conducting advertising and marketing activities and promotions, including the sending of newsletters.

Please note that you can contact us through Telegram, send us a message on Facebook or Instagram. When using such third-party services, please review the data privacy policies of the companies before providing us with information containing your personal data. More details about the data collected and the subjects for these purposes are provided in Appendix 1.

5. Main Rights and Duties

5.1. The Operator has the right to:

- Independently determine the composition and list of measures necessary and sufficient to fulfill the obligations established by the Law and regulatory legal acts adopted in accordance with it, unless otherwise provided by legislation.
- Entrust the processing of personal data to another party, based on a contract concluded with that party, unless otherwise provided by legislation. The entity processing personal data on behalf of the Operator must comply with the principles and rules of personal data processing as provided by the Law.
- Continue processing personal data without the consent of the data subject in the event of the data subject's withdrawal of consent, if there are legal grounds as specified in the Law.

5.2. The Operator is obligated to:

- Organize the processing of personal data in compliance with the requirements of the Law.
- Respond to requests from data subjects in accordance with the requirements of the Law.
- Report violations of personal data protection systems to the authorized body for the protection of the rights of data subjects immediately, but no later than three working days after the Operator becomes aware of such violations.
- Comply with the requirements of the authorized body for the protection of the rights of data subjects regarding the elimination of violations of personal data legislation.

5.3. Data subjects have the right to:

- Receive information related to the processing of their personal data, except in cases provided by legislation. Information is provided to the data subject by the Operator in an accessible form and should not contain personal data related to other data subjects, except in cases where there are legal grounds for disclosing such personal data. The list of information and the procedure for obtaining it are established by the Law.
- Demand the correction of their personal data if the personal data is incomplete, outdated, or inaccurate.
- Receive information about the provision of their personal data to third parties, except as provided by Belarusian legislation.
- At any time, without providing reasons, withdraw their consent to the processing of personal data.
- Demand from the Operator the blocking or deletion of personal data, including if the data was obtained illegally or is unnecessary for the stated processing purpose.
- Appeal against actions (or inaction) and decisions of the Operator that violate their rights in the processing of personal data to the authorized body for the protection of the rights of data subjects, in accordance with the procedures established by the legislation on citizens' and legal entities' appeals.

5.4. To exercise their rights related to the processing of personal data by the Operator, data subjects submit a written application or an electronic document (and in the case of withdrawing consent, also in the form in which such consent was received) to the postal address 220076, Minsk, Kirilla Turovskogo Street, Building 8, Room 154, or to the email address info@printplace.by. Such an application should contain:

- The last name, first name, and patronymic name (if applicable) of the data subject, along with their address of residence (domicile).
- Date of birth of the data subject.
- A description of the data subject's requests.
- The data subject's identification number, or in cases where such a number is absent, the document number confirming the identity of the data subject, if this information was provided by the data subject when giving consent or if the processing of personal data is carried out without the consent of the data subject.
- The personal signature (for a written application) or an electronic digital signature (for an application in electronic document form) of the data subject.

5.5. If the application of the data subject does not contain all the necessary information as required by the Law or the Operator has the right not to refuse the exercise of a particular right on the grounds established by the Law or other legislative acts, a reasoned refusal is sent to the data subject.

6. Data Subjects

6.1. The Operator processes personal data, both automated and non-automated, of the following categories of data subjects:

- Clients who are natural persons, representatives of legal entity clients who have entered into contracts for services with the Operator.
- Visitors to the Operator's website.
- Contractors who are natural persons.
- Individuals whose personal data processing is entrusted to the Operator as an authorized person based on contracts concluded with other personal data processing operators.
- Authorized representatives of the above-mentioned data subjects.

6.2. The list, purposes, and processing periods of personal data for the above-mentioned categories of data subjects are provided in the Appendix to this Policy.

7. Procedure for Obtaining Consent from Data Subjects

7.1. The Operator provides the data subject with information regarding the processing, either in written or electronic form that corresponds to the form of expressing consent, and explains to the data subject their rights related to the processing of personal data, the mechanisms for exercising these rights, and the consequences of giving or refusing consent.

7.2. Data subjects express their consent for the processing of their personal data under the conditions specified in the relevant information and explanations.

7.3. The main forms of obtaining consent include:

- In written documents, by choosing the appropriate option (if available) and providing a handwritten signature.
- Electronically, for instance, by completing registration forms, online forms, receiving candidate questionnaires for employment, including marking checkboxes on the Operator's website, and other actions that allow the Operator to understand that consent has been validly given.

7.4. If there are any questions and a need for additional information and explanations within the framework of the principle of transparency in the processing, a data subject may contact OOO "FINISTRA" at any time to obtain such information or data.

8. Procedure and Conditions of Personal Data Processing

8.1. The processing of personal data is carried out by employees of the Operator whose job responsibilities include personal data processing.

8.2. The Operator's processing of personal data is based on the following principles:

- Personal data processing is carried out on a legal and fair basis.
- Personal data processing is proportionate to the declared purposes of their processing and ensures a fair balance of interests of all interested parties at all stages of such processing.

- Personal data processing is limited to the achievement of specific, predefined, lawful purposes. Processing that is incompatible with the initially stated purposes is not allowed.
- The content and scope of the processed personal data correspond to the declared purposes of their processing. Processed personal data is not excessive in relation to the stated purposes of their processing.
- The processing of personal data is transparent. Relevant information regarding the processing of personal data can be provided to the data subject.
- The Operator takes measures to ensure the accuracy of the personal data it processes and updates them when necessary.
- Personal data is stored in a form that allows the identification of the data subject, but no longer than the purposes of processing require, unless a different storage period is established by the legislation of the Republic of Belarus.
- The destruction of personal data is ensured upon the achievement of the purposes of processing or when there is no longer a need to achieve these purposes, unless otherwise provided by the legislation of the Republic of Belarus.

9. Update, Correction, Deletion, and Destruction of Personal Data, Responses to Data Subject Requests

9.1. In case of discovering inaccurate personal data when requested by the data subject or as per their request or at the request of the authorized body for the protection of the rights of data subjects, the Operator blocks the personal data related to this data subject from the moment the request or inquiry is received, for the verification period.

9.2. In case of confirming the inaccuracy of personal data based on the information provided by the data subject or the authorized body for the protection of the rights of data subjects, or other necessary documents, the Operator clarifies (modifies) the personal data within 15 days from the day of receiving such information and removes the block on the personal data.

9.3. If unauthorized processing of personal data is detected when receiving a request from the data subject or at the request of the authorized body for the protection of the rights of data subjects, the Operator deletes, or in cases of technical impossibility, blocks the unlawfully processed personal data related to this data subject from the moment of such request or inquiry.

9.4. Upon achieving the processing purposes and in the event of the data subject withdrawing their consent for processing, personal data is subject to deletion unless otherwise provided by the legislation of the Republic of Belarus.

9.5. At the request of the Operator, the Operator's client must confirm the compliance of their personal data with the information provided in the registration form at the time of entering into the contract by providing an identity document.

9.6. The Operator ensures the following response times for data subject requests:

- A request with consent withdrawal: within a 15-day period to inform about the termination of personal data processing and perform their deletion, or to provide a motivated refusal.
- A request for information related to the processing of their personal data: a response within 5 days.
- A request to make changes to personal data: a response within a 15-day period.
- A request for information on the provision of personal data to third parties: a response within a 15-day period.
- A request to terminate the processing of personal data, including their deletion: a response within a 15-day period.

10. Measures for the Protection of Personal Data

10.1. The Operator takes necessary legal, organizational, and technical measures to protect personal data from unauthorized or accidental access, destruction, alteration, blocking, distribution, and other unauthorized actions, including:

- Identifying security threats related to personal data processing.
- Establishing local regulatory acts and other documents that regulate relations in the field of personal data processing and protection.
- Appointing responsible persons for organizing the processing and ensuring the security of personal data in the structural units and information systems of the Operator.
- Creating necessary conditions for working with personal data.
- Organizing document and information system records containing personal data.
- Organizing work and creating an information protection system in information systems where personal data is processed.
- Storing personal data in conditions that ensure their safety and prevent unauthorized access.
- Organizing training for employees of the Operator involved in personal data processing and individuals responsible for internal control over personal data processing.

10.2. Ensuring the security of customer information during information processing within the Operator's systems is carried out in accordance with the requirements of the legislation of the Republic of Belarus.

11. Transfer of Personal Data to Third Parties

11.1. The Operator, in the course of its activities, may transfer personal data of data subjects to third parties (authorized authorities and Operator's counterparties) in strict compliance with the requirements of the legislation of the Republic of Belarus and local regulations, ensuring the proper security of this data.

11.2. Disclosure of personal data to third parties and their distribution is not allowed without the consent of the data subject unless otherwise provided by legislation. Consent for the processing of personal data for one purpose is separate from other consents by the data subject for the processing of their personal data for other purposes.

11.3. When transferring personal data to a third party, the following conditions must be met:

- The transfer (provision) of personal data to a third party is based on a contract, the essential condition of which is ensuring the confidentiality of personal data by the third party during their processing. Contracts with authorized persons contain the necessary conditions in accordance with Article 7 of the Law.
- The transfer (provision) of personal data to a third party is carried out in accordance with the current legislation of the Republic of Belarus.
- The presence of the data subject's consent to transfer their personal data to a third party, except in cases provided for by legislation.

11.4. The transfer of personal data to investigative and law enforcement agencies, tax authorities, social protection organizations, and other executive authorities and organizations is carried out in accordance with the requirements of the legislation of the Republic of Belarus.

11.5. The list of authorized persons who, on behalf of the company, process the personal data of the client, is posted on the Operator's website (www.printplace.by).

12. Responsibility

12.1. Employees of the Operator who violate the established procedure for the processing and security of personal data bear disciplinary, administrative, civil, or criminal liability in accordance with the legislation of the Republic of Belarus.

12.2. Compliance with the Policy's requirements is monitored by the person responsible for organizing the processing of personal data at the Operator.

12.3. Responsibility for the violation of the requirements of the legislation of the Republic of Belarus and regulatory acts of the Operator in the field of personal data processing and protection is determined in accordance with the legislation of the Republic of Belarus.