

APPROVED

Order of the director of private unitary enterprise " Catoli " dated
September 20, 2023 No. 02-09/2023

**POLICY regarding the processing of personal data Private
unitary enterprise for the provision of services “ Catoli ”**

2023
Minsk

CHAPTER 1 GENERAL PROVISIONS

1. This Policy defines the activities of the Private Unitary Enterprise for the provision of services “Catoli (Catoli Consults)” (UNP 193706562), registered at the address: 220018, Minsk, st. Timoshenko, 38, apartment 169, 1st floor (hereinafter referred to as the Company) in relation to the processing of personal data of all subjects whose data is processed by the Company, being an operator within the meaning of the Law of the Republic of Belarus of May 7, 2021 No. 99-Z “On the protection of personal data” (hereinafter referred to as the Law).

2. The policy has been developed in accordance with the provisions of the Law and other acts of legislation of the Republic of Belarus.

3. The goals of this Policy are to ensure adequate protection of personal data, as well as other information about personal data subjects from unauthorized access and disclosure, as well as unification of the procedure for processing such data by the Company in accordance with the requirements of the legislation of the Republic of Belarus.

4. This Policy applies to all actions performed by the Company with personal data using or without the use of automation tools.

5. For the purpose of this Policy, terms are used with the following meanings:

counterparty – a party to a civil contract, concluded with the Company; personal account - a set of protected website pages created as a result of registration of the subject of personal data by filling out a special form, using which the subject has the opportunity to receive legally and technically significant information regarding the Company’s services, conclusion, execution, termination of contracts, as well as carry out other actions provided for explicit functions of your personal account; website – an information resource of the Company on the global computer network Internet, addressed via a domain names catoliconsults.com and catoliconsults.by; services – a set of works (services) related to the Company’s activities aimed at meeting the needs of personal data subjects.

subject of personal data or subject - an individual, in relation to which personal data is processed.

Other terms used in this Policy are used in the meanings defined by the Law.

6. The Policy is mandatory for familiarization and execution by all persons authorized to process personal data in the Company, and persons involved in organizing the processing and ensuring the protection of personal data in the Company.

7. This Policy comes into force from the moment of its approval.

8. Ensuring unrestricted access to the Policy is achieved by publishing it in the public domain on the Company's website.

CHAPTER 2

PRINCIPLES FOR PROCESSING PERSONAL DATA

9. The company takes actions to protect the privacy of personal data subjects, as well as their rights to confidentiality, regardless of the methods of collecting personal data, taking into account the following principles of their processing:

9.1. principle of legality and transparency. Personal data will be processed legally, fairly and transparently on the basis of this Policy and the laws of the Republic of Belarus.

If the subject does not agree with the processing of personal data, the Company notifies that services, the implementation of which is directly related to the processing of personal data, may be unavailable, and use of the site is limited;

9.2. principle of limiting goals. Personal data is processed by the Company only for express and legitimate purposes and must not be further processed in a manner incompatible with these purposes;

9.3. principle of data minimization. The list of personal data should be limited only to that information that is necessary in relation to the purposes for which it is processed;

9.4. the principle of accuracy and reliability of data. Personal data must be accurate and reliable. The personal data subject must take all reasonable measures to ensure that incomplete, outdated or inaccurate personal data, depending on the purposes of their processing, are deleted or corrected without delay;

9.5. principle of limiting the period of data storage. Personal data must be stored in a form that allows the subject of personal data to be identified, but not longer than required for the purposes of processing personal data;

9.6. principle of confidentiality and data security. Personal data must be processed by the Company in a manner that ensures adequate security of personal data, including protection from unauthorized or illegal processing, as well as from accidental loss, destruction or damage, using appropriate legal, organizational and technical measures.

CHAPTER 3
OBJECTIVES AND LEGAL BASIS FOR PROCESSING PERSONAL DATA

DATA. CATEGORIES OF SUBJECTS AND SCOPE OF PROCESSED PERSONAL DATA

10. The company, acting as an operator, processes personal data of subjects for the purposes and on the grounds specified in table 1.

Personal data of the subjects specified in sections 4 and 6 of Table 1 are also processed taking into account the provisions of the Regulations for the processing of personal data of the Company's employees and other persons in labor and related relations with the Company (hereinafter referred to as the Regulations).

Pursuant to paragraph 4 of Article 17 of the Law, the Regulations are published in the public domain for the Company's employees and other persons in labor and related relations with the Company in the Company's internal information system.

Table 1

Subjects	Processed data	Purpose of processing	Legal basis
Section 1			
Site users who have registered a personal account	Last name, first name, surname; Date of Birth; Postal address and/or address	Providing services to the user (works) provided by the Company;	An agreement concluded with the subject of personal data and/or Agreement.

	<p>Company legal requirements of the Republic of Belarus, and provided by the subject of personal data upon request Companies</p>	<p>Fulfillment of duties (powers) provided for by legislative acts of the Republic Belarus;</p>	<p>paragraph 20 of Article 6 of the Law, as well as Part. 2 clause 18, para . 4 p. 27 Instructions on the registration of domain names in the national domain zone, clause 4 of the Regulations on the procedure for state registration of information networks, systems and resources of the national segment of the global computer network Internet located on the territory of the Republic Belarus</p>
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		<p>Ensuring compliance with the norms of current legislation, execution of judicial acts, acts of other bodies or officials subject to execution in accordance with the law;</p>	<p>Compliance with legal requirements Republic Belarus</p> <p>An agreement concluded with the subject of personal data;</p> <p>and/or</p> <p>Agreement</p>
		<p>Prevention and suppression of dishonest behavior on the part of personal data subjects, assistance in preventing, identifying and suppressing offenses and crimes;</p>	<p>Compliance with legal requirements Republic Belarus</p> <p>An agreement concluded with the subject of personal data;</p> <p>and/or</p> <p>Agreement.</p>
		<p>Implementation of information and advertising mailings, sending commercial offers to subjects of personal data;</p>	<p>An agreement concluded with the subject of personal data;</p> <p>and/or</p> <p>Agreement.</p>

		Conducting promotions, surveys, interviews, testing on the website by the Company;	Agreement.
		Assessment and analysis of the Company's work, monitoring and improving the quality of the Company's services;	Agreement.
		Registration and maintenance of accounts on the website;	Agreement.
		Ensuring the functioning and security of the Company's website.	Agreement.
Section 2			

<p>Site users who fill out forms on the site (in particular, applications, newsletter subscription forms, feedback forms, registration on events and others)</p>	<p>Last name, first name, surname;</p> <p>E-mail address;</p> <p>Phone number;</p> <p>Postal address and/or address registration;</p> <p>Information about the user's identity document (series number, date of issue, information about the authority that issued the document, identification number);</p> <p>Information about purchased Company services;</p>	<p>Performing actions required in accordance with the request of the personal data subject (response to the request, consulting on the issue of the personal data subject, etc.);</p>	<p>para . 20 tbsp. 6 and para . 16 clause 2 art. 8 Law, paragraph 1, art. 3 Law of the Republic of Belarus of July 18, 2011 No. 300-Z “On appeals from citizens and legal entities”;</p> <p>An agreement concluded with the subject of personal data;</p> <p>and/or</p> <p>Agreement</p>
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	<p>Information about requests (complaints) of the subject of personal data;</p> <p>Other data that the subject of personal</p>	<p>Implementation of information and advertising mailings, sending commercial offers to subjects of personal data;</p>	<p>An agreement concluded with the subject of personal data;</p> <p>and/or</p> <p>Agreement.</p>
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data indicates in the form to be filled out.	Carrying out Company promotions, surveys, interviews, testing on the site;	Agreement.
	Assessment and analysis of the Company's work, monitoring and improving the quality of the Company's services;	Agreement.
	Ensuring the functioning and security of the Company's website.	Agreement.
	Ensuring compliance with the norms of current legislation, execution of judicial acts, acts of other bodies or officials subject to execution in accordance with the law;	Compliance with legal requirements Republic Belarus An agreement concluded with the subject of personal data; and/or Agreement.

		Suppression of dishonest behavior on the part of personal data subjects, assistance in preventing, identifying and suppressing offenses and crimes.	Compliance with legal requirements Republic Belarus An agreement concluded with the subject of personal data; and/or Agreement.
Section 3			
Counterparties Companies; Representatives of the Company's counterparties; Employees of counterparties; Former employees of contractors	Last name, first name, surname; Date of Birth; Postal address and/or address registration; Job title;	Preparation, conclusion, execution, amendment and termination of an agreement to which the subject of personal data is a party (including verification of the counterparty);	An agreement concluded with the subject of personal data; and/or Agreement.
	E-mail address; Phone number; Information about the user's identity document (series number, date of issue, information about the authority that issued the document, identification	Carrying out communications with subjects of personal data;	para . 20 tbsp. 6 and para . 16 clause 2 art. 8 Law, paragraph 1, art. 3 Law of the Republic of Belarus of July 18, 2011 No. 300-Z "On appeals from citizens and legal entities";

	th number);		
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	Information about purchased Company services;		An agreement concluded with the subject of personal data; Agreement.
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	<p>Information about requests (complaints) of the subject of personal data;</p> <p>Other data provided by the subject of personal data as part of the conclusion and execution of the contract, as well as data necessary for the Company to comply with legal requirements of the Republic of Belarus, and provided by the subject of personal data at the request of the Company.</p>	<p>Fulfillment of duties (powers) provided for by legislative acts of the Republic Belarus;</p>	<p>paragraph 20 of Article 6 of the Law, as well as Part. 2 clause 18, para . 4 p. 27</p> <p>Instructions for registering domain names in the national domain zone, clause 4 of the Regulations on the procedure for state registration of information networks, systems and resources of the national segment of the global computer network Internet located on the territory of the Republic Belarus</p>
		<p>Ensuring compliance with the norms of the current legislation of the Republic of Belarus, execution of judicial acts, acts of other bodies or officials subject to</p>	<p>Compliance with legal requirements Republic Belarus</p>

		execution in accordance with the legislation of the Republic of Belarus;	An agreement concluded with the subject of personal data; and/or Agreement.
		Prevention and suppression of dishonest behavior on the part of personal data subjects, assistance in preventing, identifying and suppressing offenses and crimes.	Compliance with legal requirements Republic Belarus An agreement concluded with the subject of personal data; Agreement.
		Registration for events held by the Company;	Agreement.
		Implementation of information and advertising mailings;	An agreement concluded with the subject of personal data; and/or Agreement.
		Assessment and analysis of the Company's work, quality control and improvement Company services;	Agreement.

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		Registration and maintenance of accounts on the site.	Agreement.
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Section 4

Counterparties Companies; Representatives of the Company's counterparties.	Last name, first name (in Latin); Bank card number in disguise form; Information about the payment system used.	Ensuring the functioning of the recurring payment system	Agreement concluded with the subject of personal data.
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Section 5

Company Participants and Company Affiliates; Workers Companies Former employees Companies	Last name, first name, surname;	Preparation, conclusion, execution, modification and termination of an employment contract with the subject of personal data, in particular, performing all actions that are necessary or become necessary within the framework of labor activity;	Registration of labor relations, implementation of labor activities of the subject of personal data in accordance with the law Republic Belarus;
	Date of Birth;		
	Postal address and/or address registration;		
	Job title;		
	E-mail address;		
	Phone number;		
	Information about the identity document		

	user (series number, date of issue, information about the authority that issued the document, identification th number);	Preparation, conclusion and execution of civil contracts;	Compliance with legal requirements Republic Belarus;
	Other data provided by the subject of personal data as part of the registration of labor relations and the implementation of labor relations, as		An agreement concluded with the subject of personal data; and/or Agreement.

	<p>well as data necessary for the Company to comply with legal requirements of the Republic of Belarus, and provided by the subject of personal data at the request of the Company.</p>	<p>Carrying out communications with subjects of personal data.</p>	<p>para . 20 tbsp. 6 and para . 16 clause 2 art. 8 Law, clause 1, art. 3 Law of the Republic of Belarus of July 18, 2011 No. 300-Z “On appeals from citizens and legal entities”;</p> <p>An agreement concluded with the subject of personal data;</p> <p>and/or</p> <p>Agreement.</p>
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		Providing benefits, compensation and additional guarantees at the expense of the employer.	Compliance with legal requirements Republic Belarus; If such benefits, compensation and additional guarantees are not provided for by law Republic of Belarus – Consent.
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		<p>Conducting personnel work and organizing records of Company employees; generation of statistical reporting and more.</p>	<p>Compliance with the requirements of the legislation of the Republic of Belarus.</p>
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Section 6			
<p>Relatives of Company employees</p>	<p>Data provided by the subject of personal data as part of registration of labor relations and implementation of labor relations, as well as data necessary for the Company to comply with legal requirements of the Republic of Belarus, and provided by the subject of personal data upon request Companies</p>	<p>Providing benefits, compensation and additional guarantees at the expense of the employer.</p>	<p>Compliance with legal requirements Republic Belarus; If such benefits, compensation and additional guarantees are not provided for by law Republic of Belarus – Consent.</p>
Section 7			

Applicants for vacant positions in the Company	Last name, first name, surname;	Attracting candidates to fill vacant positions in the Company;	Agreement concluded with the subject personal data;
	Date of Birth;		and/or Agreement.
	Postal address and/or address registration;	The Company's decision to employ or refuse to employ the Applicant.	Compliance with legal requirements Republic Belarus;
	E-mail address;		Agreement concluded with the subject
	Phone number;		
	Information about education; Information about work experience;		

	Other data provided by the subject of personal data.		personal data;
			and/or Agreement.
		Maintaining an archive of information about candidates for vacant positions in the Company, subject to provision of suitable and specific measures to protect the fundamental rights and interests of the subject of personal data.	Compliance with legal requirements Republic Belarus; An agreement concluded with the subject of personal data; and/or Agreement.

Section 8			
Participants in events held by the Company	Last name, first name, surname;	Providing access to an event held	Agreement.
	Date of Birth;	The company (pass to the hall, sending a link to an online event, and so on);	
Participants in events held by the Company	Postal address and/or address registration;	Carrying out communications with subjects of personal data;	para . 20 tbsp. 6 and para . 16 clause 2 art. 8
	Job title;		Law, clause 1, art. 3
	E-mail address;		Law of the Republic of Belarus of July 18, 2011
	Phone number;		No. 300-Z “On appeals from citizens and legal entities”;
	Other data provided by the subject of personal data.		
			An agreement concluded with the subject of personal data;
			and/or
			Agreement.
		Providing information about the Company and its services;	Agreement.
		Providing mailing lists about Company events.	Agreement.

11. The company ensures that the content and volume of processed personal data corresponds to the stated purposes of processing and, if necessary, takes measures to eliminate their redundancy in relation to the stated purposes of processing.

If any of the purposes of processing specified in Table 1, for which the Company took the consent of the personal data subject, is changed, in the absence of other grounds for such processing, the Company is obliged to request repeated consent from the personal data subject in accordance with the changed purpose.

12. The company may process personal data of subjects within the framework of the following actions (or a set of actions): collection, systematization, storage, modification, use, depersonalization, provision, deletion of personal data.

13. Methods of processing personal data by the Company:
using automation tools; without using them;
in a mixed way.

14. The company processes special personal data only with the consent of the subject of personal data or without consent in cases provided for by the legislation of the Republic of Belarus.

In particular, the Company processes special personal data of persons related to employee accidents (health data). At the same time, the Company takes measures aimed at preventing risks that may arise during the processing of such personal data for the rights and freedoms of personal data subjects.

15. The company, if necessary, to achieve the purposes of data processing, has the right to transfer personal data to third parties in compliance with the requirements of the legislation of the Republic of Belarus.

16. The time frame for processing personal data by the Company is determined taking into account:

established purposes for processing personal data; terms of contracts concluded with subjects of personal data; validity periods of consents of personal data subjects to processing of their personal data; terms determined by the Regulations and legislation of the Republic of Belarus.

17. The company stops processing personal data in the following cases:

upon the occurrence of conditions for termination of processing of personal

data or upon expiration of established deadlines; upon achievement of the purposes of their processing or in case of loss
the need to achieve these goals; at the request of the subject of personal data, in cases provided for by the legislation of the Republic of Belarus on the protection of personal data; in case of detection of unlawful processing of personal data, if it is impossible to ensure the legality of the processing of personal data; in case of liquidation of the Company.

CHAPTER 4
OTHER INFORMATION ABOUT ENTITIES PERSONAL DATA
PROCESSED BY THE COMPANY

18. The company also has the right to process other information about personal data subjects, which includes:

data automatically received by the server when accessing the site from using bookmarks (cookies);

data automatically received by the server when accessing the site and subsequent user actions on the site (including, but not limited to: host IP address, type of operating system of the site user, browser type, site pages visited by the user).

19. The information specified in paragraph 18 of this Policy is processed by the Company in order to obtain anonymous (depersonalized) and aggregate statistics to improve functionality, as well as improve the quality of the site, improve the Company's services, as well as for the purpose of preventing and suppressing dishonest behavior on the part of personal data subjects , assisting in the prevention, detection and suppression of offenses and crimes and ensuring the display of personalized and relevant content to site users.

20. The Company, if necessary and to achieve the purposes of processing information about personal data subjects specified in paragraph 18 of this Policy, has the right to transfer such information to third parties in compliance with the requirements of the legislation of the Republic of Belarus.

21. The company may process information about personal data subjects specified in paragraph 18 of this Policy within the framework of the actions, conditions, methods and terms specified in paragraphs 12, 13, 15, 16 of this Policy.

CHAPTER 5
PROCESSING PROCEDURE AND CONDITIONS
PERSONAL DATA

22. The basis for the processing of personal data is the consent of the subject of the personal data, with the exception of cases established by the legislation of the Republic of Belarus, when the processing of personal data is carried out without obtaining such consent.

23. The consent of the subject of personal data is a free, unambiguous, informed expression of his will, through which he authorizes the processing of his personal data.

Refusal to give consent to the processing of personal data gives the Company the right to refuse the subject of personal data to provide services (work) to the Company, the implementation of which is directly related to the processing of personal data.

24. The storage of personal data is carried out in a form that makes it possible to identify the subject of personal data for a period no longer than required by the purposes of processing personal data, except in cases where the storage period for personal data is established by the legislation of the Republic of Belarus, an agreement concluded (to be concluded) with the subject of personal data, in order to carry out the actions established by this agreement.

25. The condition for terminating the processing of personal data may be the achievement of the goals of processing personal data, the expiration of the period for processing personal data, the withdrawal of the consent of the subject of personal data to the processing of his personal data, as well as the identification of unlawful processing of personal data.

26. The company, acting as an authorized person, processes personal data of subjects who are clients of third parties, acts on behalf of the processing of personal data in accordance with the law
The Republic of Belarus.

CHAPTER 6
RIGHTS OF PERSONAL DATA SUBJECTS AND MECHANISM
EXERCISE OF THESE RIGHTS

27. The subject of personal data has a set of rights in relation to his personal data indicated in table 2:

table 2

No.	Right of the subject of personal data	Contents of law	Operator actions
1.	The right to receive information regarding the processing of personal data	The subject has the right to receive information regarding the processing of his personal data, containing: name and location of the operator, confirmation of the fact of processing of personal data by the operator,	The operator, within 5 working days after receiving an application from the personal data subject, provides the requested information or notifies the personal data subject of the reasons for refusing to provide it.
		personal data of the subject and the source of their receipt, legal grounds and purposes of processing personal data, the period for which the subject's consent is given, name and location of the authorized person.	

	2. The right to receive information about the provision of personal data to third parties	The subject of personal data has the right to receive from the operator information about the provision of his personal data to third parties once a calendar year free of charge.	The operator, within up to 15 calendar days from the moment the subject sends the corresponding request, provides the subject of personal data with information about what personal data of this subject and to whom were provided during the year preceding the date of filing the application, or notifies the subject of personal data about the reasons for refusal to provide it.
	3. The right to make changes to your personal data	The subject of personal data has the right to demand that the operator make changes to his personal data if they are incomplete, outdated or inaccurate.	The operator, within 15 calendar days from the date the subject sends the corresponding request, makes changes to the personal data if they are incomplete, outdated or inaccurate.
	4. The right to demand termination of processing of personal data and (or) deletion of personal data	The subject of personal data has the right to demand that the operator stop processing his personal data free of charge, including its deletion, if there are no grounds for processing personal data.	The operator, within up to 15 calendar days from the moment the subject sends the corresponding request, stops processing personal data, except in cases where the operator has the right to continue processing personal data if there are grounds,
			established by the legislation of the Republic of Belarus.

5.	The right to withdraw previously provided consent to the processing of personal data	The subject of personal data has the right to withdraw his consent to the processing of personal data at any time without giving reasons.	The operator, within up to 15 calendar days from the moment the subject sends the corresponding request, stops processing personal data, deletes it and notifies the subject of personal data about this, except in cases where the operator has the right to continue processing personal data if there are grounds established by the legislation of the Republic of Belarus.
6.	The right to appeal actions (inaction) and decisions of the operator related to the processing of personal data	The subject of personal data has the right to appeal actions (inaction) and decisions of the operator that violate his rights when processing personal data to the authorized body.	

28. The exercise of one or more powers specified in Table 2 is carried out by the subject of personal data by submitting a request (application) in writing by registered mail, or in the form of an electronic document. At the same time, the right to revoke previously granted consent to the processing of personal data can be exercised in electronic form, corresponding to the form of expression of such consent.

29. The request (application) must contain: last name, first name, patronymic of the subject of personal data; address of residence (place of stay); date of birth;

identification number (if indicated when giving consent or the processing of personal data is carried out without the consent of the subject of personal data); statement of the essence of the requirement;

personal signature or electronic digital signature.

30. The request (application) must be submitted: in writing to the address: 2200 18, Minsk, st. Timoshenko, 38,

apartment 169, 1st floor or;

in in the form of an electronic document on an electronic address: info@catoliconsults.com and info @catoliconsults.by ; in electronic form to the email address: info@catoliconsults.com and info @catoliconsults.by .

31. Any information (including personal data) that the subject of personal data provides when registering a personal account may be used by the Company in accordance with this Policy.

32. Termination of the Company's processing of the subject's personal data may make it impossible to further provide the subject with the Company's services.

33. A person who provides the Company with incomplete, outdated, unreliable information about himself, or information about another subject of personal data without the latter's consent, is liable in accordance with the legislation of the Republic of Belarus.

CHAPTER 7
MEASURES USED BY THE COMPANY FOR PROTECTION
PERSONAL DATA OF SUBJECTS

34. The company takes and constantly improves the necessary legal, organizational and technical measures to ensure the protection of personal data from unauthorized or accidental access to it, modification, blocking, copying, distribution, provision, deletion of personal data, as well as from other unlawful actions in relation to personal data. data.

35. Legal measures taken by the Company:

The company has developed and put into effect documents establishing the procedure for processing and ensuring the protection of personal data, which ensure compliance with the requirements of the Law and other acts of legislation of the Republic of Belarus governing relations in the field of personal data.

36. Organizational measures taken by the Company include:

appointment by the Company of a person and (or) structural unit responsible for internal control over the processing of personal data;

familiarization of the Company's employees with the requirements of the legislation of the Republic of Belarus and regulatory documents

Companies in the field of working with personal data; determination by the Company of a list of persons whose access to personal data processed in the information system is necessary for them to perform their job duties; publication of internal documents defining the Company's policy regarding the processing of personal data, local legal acts on the processing of personal data, as well as local legal acts establishing procedures aimed at preventing and identifying violations when working with personal data, eliminating the consequences of such violations.

37. Technical measures taken by the Company include:

implementation of technical and cryptographic protection
personal data in the manner established by the Operational Analytical Center under the President of the Republic of Belarus, in accordance with the classification of information resources (systems) containing personal data.

CHAPTER 8

CROSS-BORDER TRANSFER OF PERSONAL DATA

38. Before the start of cross-border transfer of personal data, the company is obliged to make sure that the foreign state to whose territory it is intended to transfer personal data provides reliable protection of the rights of personal data subjects.

39. Cross-border transfer of personal data to the territory of foreign states that do not meet the above requirement can be carried out only in cases provided for by the Law.

CHAPTER 9
FINAL PROVISIONS

40. Issues related to the processing of personal data not covered by this Policy are regulated by other local legal acts of the Company, as well as by law The Republic of Belarus.

41. In the event that any provision of the Policy is found to be contrary to law of the Republic of Belarus, other provisions corresponding to the legislation Republic of Belarus will remain in full force and effect and any invalid provision will be deemed deleted/modified to the extent necessary to ensure compliance with the law. The Republic of Belarus.

42. The operator has the right, at its discretion, to change and (or) supplement the terms of this Policy without prior and (or) subsequent notification of the subjects of personal data. The current version of the Policy is constantly available on the Company's website.

Director