

## **Privacy Policy of LLC «RTL Alliance» Regarding the Processing of Personal Data**

This document defines the policy of LLC «RTL Alliance» regarding the processing of personal data (hereinafter - the Policy). The Policy is developed in compliance with the requirements of the Constitution of the Republic of Belarus, the Law of the Republic of Belarus dated May 7, 2021, No. 99-Z «On the Protection of Personal Data» (hereinafter - the Law), and other legislative and normative acts of the Republic of Belarus in the field of personal data, as well as international agreements of the Republic of Belarus. The purpose of this policy is to comply with the legislation of the Republic of Belarus on personal data and protect the interests of data subjects.

### **General Provisions**

1.1. The Operator is Limited Liability Company «RTL Alliance», located at 14 Skryganova Street, Office 65, Minsk, Belarus (hereinafter - the Operator).

1.2. The Operator operates in the B2B sector in the field of transport and forwarding services and collaborates exclusively with legal entities.

This Policy applies when the Operator processes personal data of users (visitors) of the Operator's website (<https://rtlalliance.com/>, <https://investor.rtlalliance.com/>, <https://venture.rtlalliance.com/>, <https://rtl.team/>, and other internet pages owned by the Operator). It applies to users submitting applications in special forms, as well as to the provision of services by the Operator within its economic activities. This policy also covers the processing of personal data of individuals seeking employment or sending inquiries to the Operator through special forms on internet pages owned by the Operator.

This Policy does not apply to the processing of personal data in the course of employment and administrative procedures (concerning employees and former employees), as well as visitors to the website (in relation to cookie files).

2. Purposes and Legal Basis for Personal Data Processing, Categories of Data Subjects, List of Processed Personal Data, Data Retention Period:

Categories of personal data subjects whose data is being processed.	The purpose of processing.	List of processed personal data.	Legal grounds for the processing of personal data.	Data retention period.
Processing of personal data obtained through forms on internet pages owned by the Operator, as well as personal data contained in job applicants' resumes.				
Individuals who submit their resumes (job applicants) (via the website form, through email).	Review of candidates' resumes for employment; Formation of a database of potential candidates.	Last name, first name, patronymic (if applicable); phone number, email, and other personal data in accordance with the content of the resume.	Consent; Paragraph 16 of Article 6 of the Law - when submitting a resume or other document signed by the individual and sent to the operator regarding the submitted resumes; Paragraph 19 of Article 6 of the Law - when reviewing resumes made available in open access.	1 year (in case of non-acceptance for employment). 1 month (in case of acceptance for employment).
Employees (officials) of potential service customers of the Operator.	Interaction with a representative of a potential customer for the purpose of providing a commercial proposal on the offered transport and logistics services.	Name, mobile phone number, email address, and other personal data provided in the request.	Processing of personal data that is necessary for the performance of duties (powers) provided for by legislative acts (the twentieth paragraph of Article 6 of the Law, Article 49, paragraph 1 of Article 183, and paragraph 5 of Article 186 of the Civil Code).	3 years from the date of receiving the application.
Individuals who have submitted requests for information through the Operator's website (specially created web pages by the Operator).	Processing of incoming requests for the purpose of providing the data subject with personal data via email (sending informational emails), mobile communications regarding tokens, information about transport and logistics services, and other requested information.	Name, email address, mobile phone number (if provided by the user), and other personal data specified in the request, as well as an audio recording of the phone conversation	Consent obtained when filling out a form on the internet page owned by the Operator.	3 years from the date of providing consent.
Processing of personal data within the scope of the Operator's economic activities.				
	Conclusion, execution,		Processing of personal data that is necessary for the	

Authorized signatories of the contract, contractors under the contract.	modification, and termination of contracts with customers (counterparties) for the provision of transport and logistics services by the Operator.	Last name, first name, patronymic or initials of the person, personal signature, and other personal data (if necessary).	performance of duties (powers) provided for by legislative acts (the twentieth paragraph of Article 6, Article 49, paragraph 1 of Article 183, and paragraph 5 of Article 186 of the Civil Code); Processing of previously disseminated personal data from open sources (paragraph 19 of Article 6 of the Law).	3 years after the expiration of the contract, or after a tax authority's check for compliance with tax legislation. If there has been no tax authority check for compliance with tax legislation, then 10 years after the expiration of the contract.
Authorized signatories of the contract, contract performers.	Conclusion, execution, modification, and termination of contracts unrelated to the services provided by the Operator.	Last name, first name, patronymic, or initials of the individual, personal signature, and other personal data (if necessary).	Processing of personal data that is necessary for the performance of duties (powers) provided for by legislative acts (the twentieth paragraph of Article 6, Article 49, paragraph 1 of Article 183, and paragraph 5 of Article 186 of the Civil Code); Processing of previously disseminated personal data from open sources (paragraph 19 of Article 6 of the Law).	3 years after the expiration of the contract, or after a tax authority's check for compliance with tax legislation. If there has been no tax authority check for compliance with tax legislation, then 10 years after the expiration of the contract.
Officials, employees of customers, potential customers.	Sending commercial offers, informational newsletters (service organization).	Email address.	Consent - with respect to personalized emails; Contract - processing of personal data that is necessary for the performance of duties (powers) provided for by legislative acts (the twentieth paragraph of Article 6, Article 49, paragraph 5 of Article 186 of the Civil Code).	3 years from the date of obtaining consent;  3 years after the expiration of the contract or after a tax authority inspection to ensure compliance with tax legislation. If no tax authority inspection was conducted, then 10 years after the expiration of the contract.
Individuals who have submitted inquiries to the Operator.	Processing of inquiries from users and visitors	<ul style="list-style-type: none"> <li>• Surname, first name, patronymic (or initials).</li> <li>• Residential address (place of</li> </ul>	The processing of personal data is necessary for the performance of duties (powers) provided by legislative acts (Paragraph 20 of Article 6 and	For 5 years from the date of the last inquiry.

	addressed to the Operator (incoming correspondence, correspondence, requests, statements, etc.), including those entered into the book of comments and suggestions.	residence). <ul style="list-style-type: none"> <li>• Email address.</li> <li>• Phone number.</li> <li>• The essence of the inquiry, and any other personal data provided by the subject in the inquiry.</li> </ul>	Paragraph 16 of Part 2 of Article 8 of the Law of the Republic of Belarus dated May 7, 2021, No. 99-Z "On Personal Data Protection," Paragraph 1 of Article 3 of the Law of the Republic of Belarus dated July 18, 2011, No. 300-Z "On Appeals of Citizens and Legal Entities").	
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The processing of special personal data concerning racial or ethnic origin, political opinions, religious or other beliefs, as well as genetic personal data, is not carried out by the Operator, except for the inclusion of such personal data in citizens' appeals.

### 3. Processing of Personal Data Procedure and Conditions

3.1. Personal data processing includes the following actions with data: collection, systematization, storage, modification, usage, anonymization, blocking, deletion, and other actions in accordance with legislation and subject's consent.

3.2. The processing is carried out using the following methods:

- Non-automated data processing;
- Automated data processing with or without data transmission through information and telecommunication networks;
- Mixed data processing.

When processing data, the Operator takes necessary legal, organizational, and technical measures to protect data from unauthorized or accidental access, alteration, blocking, copying, distribution, provision, deletion, and other unlawful actions regarding data.

3.3. In most cases, personal data is processed automatically without access by any of the Operator's employees. In the event access is required, it can be provided only to those employees who need it to perform their duties in accordance with the law and only for the purposes specified in this Policy. To protect and ensure data confidentiality, all employees are obliged to follow internal rules and procedures related to personal data processing. They must also adhere to all technical and organizational security measures in place to protect user personal data.

3.4. The Operator may disclose personal data to third parties in the following cases:

- If the data subject has given their consent;
- Data transfer is carried out in the provision of transport and logistics services by the Operator when such data transfer is necessary for the performance of contracts concluded by the Operator;
- Data transfer is prescribed by legislative acts and is necessary to achieve the goals, carry out the functions, powers, and duties imposed by the legislation of the Republic of Belarus on the Operator.

3.5. Cross-border data transfer by the Operator is not carried out.

#### 4. Rights of Personal Data Subjects and Mechanisms of Their Implementation.

4.1. Data subjects have the following rights:

4.1.1. The right to withdraw their consent if the Operator obtained the subject's consent for processing personal data. However, this right cannot be exercised when processing is carried out in cases provided by legislation.

4.1.2. The right to receive information concerning the processing of their personal data by the Operator. This information should include:

- The name and location of the Operator;
- Confirmation of the fact of processing the personal data of the data subject;
- Personal data and their source;
- Legal grounds and purposes for processing personal data;
- The duration of their consent (if processing is based on consent);
- The name and location of the authorized person(s);
- Other information as required by legislation.

4.1.3. The right to request the Operator to amend their personal data if it is incomplete, outdated, or inaccurate. To do this, the data subject must provide the necessary documents and/or certified copies to confirm the need for changes to their personal data.

4.1.4. The right to obtain information from the Operator about the provision of their personal data to third parties processed by the Operator. This right can be exercised once a year, and the provision of such information is free of charge.

4.1.5. The right to demand the Operator to cease processing their personal data, including their deletion, in the absence of legal grounds for personal data processing as provided by the Law and other legislative acts.

4.1.6. The right to appeal the actions (inaction) and decisions of the Operator that violate their rights during the processing of personal data to the authorized body for the protection of personal data subjects' rights, following the procedures established by the legislation on the appeals of individuals and legal entities.

4.2. To exercise their rights related to the processing of personal data by the Operator, the data subject must submit a written application to the Operator or an electronic document to the postal address or email address specified in section 4.3 of this Policy. Such an application should include:

- Surname, first name, patronymic (if applicable) of the data subject, along with their address of residence (domicile);
- Date of birth of the data subject;
- A statement of the nature of the data subject's requirements;
- The identification number of the data subject, or in the absence of such a number, the number of the identity document of the data subject, if such information was provided by the data subject when giving their consent or if the processing of personal data is carried out without the consent of the data subject;

- The personal signature (for written applications) or the electronic digital signature (for electronic document applications) of the data subject.

4.3. For assistance in exercising their rights related to the processing of personal data by the Operator, the data subject may also contact the person responsible for internal control over the processing of personal data in the Organization by sending a message to the email address: [dpo@rtlalliance.com](mailto:dpo@rtlalliance.com).

## 5. Changes to the Policy

5.1. Changes can be made to this Policy. The Operator has the right to make changes at their discretion, including when such changes are related to amendments in applicable legislation and when changes are necessary to achieve the purposes of processing personal data.

5.2. The Operator has the right to make changes and/or additions to this Policy at their discretion without notifying data subjects. The current version of this Policy is available on the internet at the following address: [https://rtlalliance.com/pdf/RTL\\_Data\\_Policy\\_ENG.pdf](https://rtlalliance.com/pdf/RTL_Data_Policy_ENG.pdf).