

PERSONAL DATA PROCESSING POLICY

Effective as of July 1, 2025

1. General Provisions

1.1. This Policy has been adopted as one of the mandatory measures implemented by Belatravel LLC to ensure the protection of personal data, in accordance with Article 17 of the Law of the Republic of Belarus dated May 7, 2021 No. 99-3 "On the Protection of Personal Data" (hereinafter referred to as the "Law").

1.2. This Policy has been developed in compliance with the Law and explains to data subjects how, for what purposes, and on what legal basis their personal data is collected, used, and otherwise processed. It also outlines the rights of data subjects in connection with such processing and the mechanisms for exercising those rights.

This Policy does not apply to the processing of personal data in the context of employment (including with respect to employees, former employees, their family members or relatives), video surveillance activities, or the processing of cookies on the Belatravel LLC website. The Cookie Policy is available online at:

<https://belatravel.by/dokumenty/>

1.3. Contact Information of Belatravel LLC:

Registered Address:

223021, Minsk Region, Minsk District, Shchomyslitsky Village Council, near the agro-town of Ozerco, multifunctional building, premises 14A/8-11

Website: <https://belatravel.by>

Email: vadimprotasovskij@gmail.com

Phone: +375 29 12 12 500

2. Procedure and Conditions for Personal Data Processing

2.1. Belatravel LLC processes personal data of the following categories of data subjects:

guests;
clients;
counterparties and their representatives.

2.2. Belatravel LLC only processes personal data that is necessary to achieve the specified purposes and does not permit the processing of data in excess of what is required.

2.3. Personal data may be processed by Belatravel LLC:

using automated means;
without the use of automated means, provided that such processing involves the ability to search for and/or access personal data based on specific criteria (e.g., filing systems, lists, databases, logs, and similar records).

2.4. Personal data is processed by Belatravel LLC on the basis of the data subject's consent, as well as on other legal grounds as provided by the Law, including:
pursuant to a contract concluded (or to be concluded) with the data subject;
for the fulfillment of obligations (or exercise of powers) established by legislative acts;
in the context of employment relationships;
where the data has been previously made publicly available by the data subject.

3. Categories of Personal Data Processed, Purposes, Legal Grounds, and Retention Periods

3. Belatravel LLC processes the following categories of personal data depending on the category of data subject:

3.1. For counterparties and their representatives:

Full name, job title of the person signing the contract, telephone number, email address, and other data as required under the terms of the contract (if applicable).

Purpose of Processing:

To conclude and perform civil law contracts (including but not limited to lease, supply, sale, contract work, and service agreements).

Legal Grounds for Processing:	Data Retention Period:
1. If the contract is concluded with an individual — processing is based on the contract with the data subject (paragraph fifteen, Article 6 of the Law). 2.If the contract is concluded with a legal entity — processing is necessary for the fulfillment of duties (or exercise of powers) established by legislative acts (paragraph twenty, Article 6 of the Law; Article 49 and Paragraph 5 of Article 186 of the Civil Code of the Republic of Belarus).	3 years after the contract expiration date, provided a tax audit has been conducted. If no audit has occurred — 10 years after the contract expiration date.

3.2. For guests:

Full name and passport details.

Purpose of Processing:

To conclude and fulfill a public contract.

Legal Grounds for Processing:	Data Retention Period:
Processing of personal data is based on the contract with the data subject (paragraph fifteen, Article 6 of the Law). Processing is also necessary for the fulfillment of obligations established by legislative acts (paragraph twenty, Article 6 of the Law; Resolution of the Ministry of Internal Affairs of the Republic of Belarus dated July 1, 2010 No. 214 "On the Procedure for Informing Internal Affairs Bodies about Foreign Citizens and Stateless Persons").	3 years after the expiration of the contract, provided a tax audit has been conducted. If no audit has taken place — 10 years after the expiration of the contract.

3.3. For clients:

Full name and phone number.

Purpose of Processing:

To provide the requested service.

Legal Grounds for Processing:	Data Retention Period:
Processing is necessary for the fulfillment of obligations established by legislative acts (paragraph twenty, Article 6 of the Law; Law of the Republic of Belarus dated January 9, 2002 No. 90-3 "On Consumer Protection").	For one month following the provision of the service.

4. Cross-Border Transfer of Personal Data

4.1. Belatravel LLC carries out cross-border transfers of personal data to the Russian Federation, where an adequate level of protection of personal data subjects' rights is ensured.

The transfer is made to the following recipient:

Apartment Systems LLC

(Russian Federation, Republic of Mari El, Yoshkar-Ola, Sovetskaya Street, 140, P.O. Box 137, 424000)

Purpose: To facilitate booking through the RealtyCalendar Online Booking Module, including the RealtyCalendar system.

5. Rights of Data Subjects

5.1. A data subject has the following rights:

Right	Содержание	Срок ответа
The right to request the correction of one's personal data	The data subject has the right to request that Belatravel LLC correct their personal data if it is incomplete, outdated, or inaccurate. To support such a request, the data subject must attach relevant documents and/or certified copies thereof, as required by law, confirming the need for correction.	Within 15 days of receiving the request
The right to obtain information regarding the processing of personal data	The data subject has the right to obtain information regarding the processing of their personal data, including: – the name and registered address of Belatravel LLC; – confirmation of whether their personal data is being processed; – their personal data and the source from which it was obtained; – the legal basis and purpose of the data processing; – the period for which consent has been granted (if the processing is based on consent); – the name and address of the authorized person(s), if Belatravel LLC has delegated processing to a third party; – other information as required by applicable law.	Within 5 days of receiving the request
The right to be informed about the disclosure of personal data to third parties	The data subject has the right to receive information from Belatravel LLC regarding the disclosure of their personal data to third parties, free of charge, once per calendar year.	Within 15 days of receiving the request
The right to request the cessation of processing and/or deletion of personal data	The data subject has the right to request, free of charge, that Belatravel LLC cease processing their personal data, including its deletion, if there are no legal grounds for such processing under applicable law.	Within 15 days of receiving the request
The right to withdraw previously given consent to the processing of personal data	The data subject may withdraw their consent to the processing of personal data at any time, without providing reasons (if such consent was requested by Belatravel LLC). This right does not apply if the processing is carried out on other legal grounds (e.g., under a contract or as required by law).	Within 15 days of receiving the request
The right to appeal the actions (or inaction) and decisions of Belatravel LLC	If the data subject believes that Belatravel LLC is processing their personal data in violation of the laws of the Republic of Belarus, they may file a complaint with the National Center for Personal Data Protection.	In accordance with the procedure established by the legislation on

related to the processing of personal data		appeals by individuals and legal entities
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5.2. To exercise any of the rights related to the processing of personal data by Belatravel LLC, the data subject must submit a written request either by post to the company's mailing address or in the form of an electronic document to the email or website address indicated in subparagraph 1.3, paragraph 1 of this Policy.

In the case of withdrawal of previously given consent, the request must be made in the same form in which the consent was originally provided.

Such a request must include the following information:

Surname, first name, and patronymic (if applicable);

Residential (or temporary) address;

Date of birth;

A description of the request;

Personal identification number or, if not available, the number of the identity document — only if this information was provided by the data subject when giving consent or if the data is being processed without consent;

A handwritten signature (for written requests) or a digital signature (for electronic documents).

Belatravel LLC does not process requests submitted via other means (such as telephone, fax, etc.).

5.3. For assistance in exercising their rights related to the processing of personal data by Belatravel LLC, the data subject may also contact the designated person responsible for internal oversight of personal data processing at the following email address:
vadimprotasovskij@gmail.com