POLICY
ON VIDEO SURVEILLANCE
IN "BLS SOLUTIONS" LIMITED LIABILITY COMPANY

CHAPTER 1 GENERAL PROVISIONS

1. This Policy explains to personal data subjects who have entered the fields of view of CCTV cameras installed in the Visa Centre of "BLS Solutions" Limited Liability Company (hereinafter – "BLS Solutions" LLC, Visa Centre) for what purposes personal data is collected, used or otherwise processed, and also reflects the rights of personal data subjects in connection therewith and the mechanism for their exercise:

1.1. The Policy is published openly on the Internet on the website **blscyprusbelarus.by** (hereinafter – the Website), and is also available for review on the information stand of the Visa Centre.

1.2. Video surveillance is carried out on the basis of paragraph twenty of Article 6 of the Law of the Republic of Belarus dated 07.05.2024 No. 99-Z "On Personal Data Protection", the Law of the Republic of Belarus dated 08.11.2006 No. 175-Z "On Security Activities in the Republic of Belarus", the Labor Code of the Republic of Belarus; recording is carried out using open CCTV cameras around the clock.

1.3. The Policy explains to personal data subjects who have entered the recording zones of the CCTV cameras of the Visa Centre the purposes of processing their images and voice recordings, and reflects the rights arising therefrom for personal data subjects and the mechanism for their exercise.

1.4. Contacts of "BLS Solutions" LLC:

- **Location address:** Republic of Belarus, 220007, Minsk, Tolstoy St., 8-2, office 204;
- **Email address:** info.cyprusinbelarus@blshelpline.com;
- **Telephone:** +375 (44) 732 23 39.

CHAPTER 2 PROCEDURE AND PURPOSES OF IMPLEMENTING VIDEO SURVEILLANCE

2.1. "BLS Solutions" LLC implements video surveillance on the premises of the Visa Centre located at: Minsk, Tolstoy St., 8-2, office 204, for the purpose of:

- Ensuring public order, including the prevention, detection, and suppression of offenses;
- Protecting individuals (visitors, employees), documents, material assets, and other property;
- Controlling visitor access to the Visa Centre;
- Ensuring executive and labor discipline.

2.2. At "BLS Solutions" LLC, video surveillance is carried out around the clock using open CCTV cameras located in publicly accessible places in the following

zones: the space of the visitor waiting hall, the Premium hall, customer service desks, biometric personal data collection desks, information desks, and other zones in the general access hall and Premium hall, emergency exits.

2.3. "BLS Solutions" LLC informs personal data subjects about the implementation of video surveillance in the Visa Centre by placing warning information signs.

2.4. Maintenance of the CCTV system of "BLS Solutions" LLC is carried out with the involvement of a third-party organization – "Molproektmontazh" LLC (location address: Minsk Region, Molodechno, Metalistov St., 2V, office 6) on the basis of a concluded agreement.

"Molproektmontazh" LLC holds a license dated 09.04.2021 No. 33030/37210000067058 for performing work on the design, installation, commissioning, and maintenance of security facilities and systems. "Molproektmontazh" LLC does not process personal data when performing maintenance of the CCTV system.

2.5. "BLS Solutions" LLC does not use the CCTV system:

- In premises intended for personal needs and rest of employees;
- For recording working hours actually worked by employees of "BLS Solutions" LLC;
- For unique identification of persons who have entered the fields of view of the CCTV cameras.

2.6. For the purpose of monitoring and improving the quality of service for visitors (applicants), resolving disputed (conflict) situations, "BLS Solutions" LLC uses 3 CCTV cameras with a sound recording function located in customer service zones: in the general access hall – 1, in the Premium hall – 1, in the applicant biometric data processing zone – 1.

2.7. "BLS Solutions" LLC informs personal data subjects about the implementation of video surveillance with a sound recording function by placing additional warning information signs in the zones where video surveillance with a sound recording function is carried out.

2.8. The storage period for video recordings is **57 days**, after which they are automatically deleted.

2.9. In the event that CCTV cameras record actions showing signs of a crime, administrative offense, and/or disciplinary misconduct, upon the instruction (verbal, written) of the Director and/or leading regional manager, Deputy Director for Security, Administrative and Legal Work (or persons acting in their capacity), the storage period for such video recordings may be extended for the period of verification procedures provided for by the legislation of the Republic of Belarus.

2.10. The right of access to CCTV camera recordings for employees of "BLS Solutions" LLC is restricted in accordance with job duties, namely:

- Employee access to view CCTV recordings is prohibited, except for the Director, leading regional manager, Deputy Director for Security, Administrative and Legal Issues, and the Personal Data Protection Specialist;
- Access for employees of "Molproektmontazh" LLC and the system administrator performing CCTV system maintenance work is carried out in the presence of an authorized representative of "BLS Solutions" LLC;
- Managers and employees of "BLS Solutions" LLC are prohibited from using video recordings for personal or other purposes not related to the performance of job duties. Video recordings are not subject to modification, use, distribution, and provision, except in cases provided for by legislative acts.

2.11. "BLS Solutions" LLC has the right to use CCTV camera recordings as evidence in civil, criminal, and administrative proceedings to confirm the fact(s) of unlawful acts (violations of labor discipline), as well as to establish other circumstances to be proven.

2.12. CCTV camera recordings captured by the Visa Centre's CCTV system regarding facts of unlawful acts may be provided to state bodies (organizations) only on the basis of a written request in cases provided for by current legislation on electronic storage media (CD, DVD). CCTV camera recordings regarding facts of labor discipline violations are stored on electronic storage media (CD, DVD) together with the verification materials.

2.13. The procedure for access to personal data, including CCTV camera recordings, is carried out in accordance with the "Policy on the Procedure for Access to Personal Data", including those processed in the information resource (system), approved by the Director or an authorized person of "BLS Solutions" LLC.

CHAPTER 3 RIGHTS OF PERSONAL DATA SUBJECTS AND THE MECHANISM FOR THEIR EXERCISE

3. Personal data subjects have the following rights:

3.1.1. The right to receive information regarding the processing of personal data. The personal data subject has the right to receive information regarding the processing of their personal data, containing:

- Name and location of "BLS Solutions" LLC;
- Confirmation of the fact of personal data processing by "BLS Solutions" LLC;
- A list of processed personal data and the source of its acquisition;
- Legal grounds and purposes of personal data processing;
- The period for which consent to personal data processing is given;
- Name and location of the authorized person(s), if the processing of personal data by "BLS Solutions" LLC has been entrusted to such person(s).

3.1.2. The right to receive information on the provision of personal data to third parties. The personal data subject has the right to receive information from "BLS Solutions" LLC on the provision of their personal data to third parties **once per calendar year free of charge**. "BLS Solutions" LLC shall, within up to **15 calendar days** from the date of receipt of the request, provide information on what personal data and to whom it was provided during the year preceding the date of application, or notify of the reasons for refusal to provide it.

3.1.3. The right to appeal the actions (inaction) and decisions of "BLS Solutions" LLC related to the processing of personal data. If a personal data subject believes that the processing of their personal data is carried out in violation of the legislation of the Republic of Belarus, they may file a complaint with the **National Center for Personal Data Protection of the Republic of Belarus**. The complaint is reviewed in accordance with the procedure established by the legislation on appeals of citizens and legal entities.

3.2. To exercise the rights specified in clause 3, it is necessary to send an application to "BLS Solutions" LLC in one of the following ways:

3.2.1. In written form (by hand delivery, mail, personally) at the address: Republic of Belarus, 220007, Minsk, Tolstoy St., 8-2, office 204 (2nd floor);

3.2.2. In the form of an electronic document containing the digital signature of the personal data subject, to the email address **info.cyprusinbelarus@blshelpline.com**.
3.3. The application must contain: surname, first name, patronymic (if any), date of birth of the personal data subject, address of their place of residence (place of stay); a statement of the essence of the requirements; personal signature or digital signature of the personal data subject.
The response to the application is sent in a form corresponding to the form of submission of the application, unless otherwise specified in the application itself.

3.4. The personal data subject has the right to apply for assistance in exercising clause 3 to the person responsible for internal control over personal data processing at "BLS Solutions" LLC or, in accordance with clause 3.2.2, send an electronic message to the email address **info.cyprusinbelarus@blshelpline.com**.

CHAPTER 4 FINAL PROVISIONS

4.1. "BLS Solutions" LLC has the right, at its discretion, to unilaterally amend and/or supplement the terms of this Policy without prior notice to personal data subjects by publishing a new edition thereof on the Website.

4.2. Issues concerning the processing of personal data not covered in this Policy are governed by the legislation of the Republic of Belarus.

4.3. This Policy enters into force from the moment of approval by the Director or an authorized person of "BLS Solutions" LLC.