

# PERSONAL DATA PROCESSING POLICY

23 November 2021

## 1. Introduction

1.1. This document sets out the policy of SBH Law Offices Limited Liability Company (hereinafter referred to as SBH Law Offices) regarding processing of personal data (hereinafter referred to as the Policy) of users of the [www.sbh-partners.com](http://www.sbh-partners.com) website.

1.2. This Policy is developed in accordance with the legislation of the Republic of Belarus on the protection of personal data. SBH Law Offices is an operator of personal data, processing of personal data shall be performed by SBH Law Offices in accordance with the Law of the Republic of Belarus No. 99-Z of May 7, 2021 "On Protection of Personal Data".

1.3. The SBH Law Offices information resource located at [www.sbh-partners.com](http://www.sbh-partners.com) (hereinafter referred to as the Site) processes personal data of the following data subjects:

- Potential clients, customers, contractors and contractors of SBH Law Offices and their representatives ("Clients");
- Candidates for positions or internships at SBH Law Offices (the "Candidates");
- Subscribers to the SBH Law Offices newsletters (the "Subscribers");
- Participants in events (including online events and webinars) organised by or involving SBH Law Offices (hereinafter referred to as Participants);
- Other users of the Website.

Hereinafter all the above-mentioned subjects are referred to as "Users". The terms "Customers", "Candidates", "Subscribers", "Members" are used when referring to the relevant subjects only and not to all Users.

1.4 The text of this Policy is available to Users on the Internet at the following link: [https://sbh-partners.com/uploads/politics\\_eng.pdf](https://sbh-partners.com/uploads/politics_eng.pdf).

1.5 This Policy applies to all processes of personal data processing of Users, including collection, systematization, storage, modification, use, depersonalization, blocking, distribution, provision, deletion of personal data, carried out with or without the use of automated means.

## 2. Data received by SBH Law Offices.

2.1 SBH Law Offices processes the following personal data of Users only for the purposes specified:

Data subject	Purpose(s) of data processing	What data is processed	Grounds for processing
Clients	Providing a response to a request if the User fills out and sends a form or e-mail or messenger message to contact SBH Law Offices.	Data that the Client provides when completing the form located at <a href="https://sbh-partners.com/svyazatsya-s-nami">https://sbh-partners.com/svyazatsya-s-nami</a> ; or when sending a letter or message to the SBH Law Offices contacts listed on the Website.	Consent (by pressing the "Give consent" button in the appropriate field)
	Entering into, amending, executing, terminating a contract with the Client.		Contract with SBH Law Office

		<p>Specifically:</p> <ul style="list-style-type: none"> <li>✓ Full name;</li> <li>✓ E-mail;</li> <li>✓ Company name;</li> <li>✓ Contact telephone number;</li> <li>✓ Other personal data that the Client (his/her representative) will provide.</li> </ul>	
<b>Candidates</b>	Data processing for the purpose of considering a Candidate for a position or internship/apprenticeship at SBH Law Offices.	<p>The data that the Candidate provides when filling in the form located at <a href="https://sbh-partners.com/onas/karera/">https://sbh-partners.com/onas/karera/</a>.</p> <p>Specifically:</p> <ul style="list-style-type: none"> <li>✓ Full Name;</li> <li>✓ E-mail;</li> <li>✓ Contact telephone number;</li> <li>✓ Other data, including special personal data, which the Candidate chooses to indicate in the attached CV.</li> </ul>	Consent <i>(by pressing the "Give consent" button in the appropriate field)</i>
<b>Participants</b>	Ensuring registration and participation at events that SBH Law Offices is involved in organising, to provide links to online events, invitations, reminders, sending all necessary materials and to inform about upcoming SBH Law Offices events or SBH Law Offices partners.	<p>Data that the Participant provides when completing the registration form for the event.</p> <p>Specifically:</p> <ul style="list-style-type: none"> <li>✓ Full name;</li> <li>✓ E-mail;</li> <li>✓ Company name;</li> <li>✓ Contact telephone number.</li> </ul>	Consent <i>(by pressing the "Give consent" button in the appropriate field)</i>
<b>Subscribers</b>	Newsletters about upcoming SBH Law Offices events, events in which SBH Law Offices is involved, changes in the law, law enforcement reviews, news and publications of SBH Law Offices or SBH Law Offices partners.	<p>The data that the Subscriber provides when filling in the form located at</p> <p><a href="https://sbh-partners.com/infocentr/novosti/">https://sbh-partners.com/infocentr/novosti/</a>;</p> <p><a href="https://sbh-partners.com/infocentr/publikacii/">https://sbh-partners.com/infocentr/publikacii/</a>;</p> <p><a href="https://sbh-partners.com/infocentr/meropriyatiya/">https://sbh-partners.com/infocentr/meropriyatiya/</a>.</p>	Согласие <i>(посредством нажатия кнопки «Дать согласие» в соответствующем поле)</i>

		Specifically: <ul style="list-style-type: none"> <li>✓ Full name;</li> <li>✓ E-mail;</li> <li>✓ Company name;</li> <li>✓ Contact telephone number.</li> </ul>	
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2.2 The User gives SBH Law Offices consent to the processing of the relevant personal data until such time as the User withdraws such consent in the manner set out in section 3.3 below of this Policy.

Withdrawal of consent entails termination of processing and deletion (or, if technically impossible to delete, blocking) of the User's personal data and, therefore, may result in inability to provide the relevant services to the User.

2.3 Processing of the User's personal data shall be carried out for no longer than the stated purposes of processing personal data or for the time period stipulated by law.

2.4 SBH Law Offices shall not verify the accuracy of the information provided by the Users and the legal capacity of the Users.

2.5 Processing of the User's personal data may be carried out with or without the use of automation tools.

2.6 SBH Law Offices may engage third parties (hereinafter referred to as authorised persons) to process Users' personal data for the relevant purposes for which Users have provided us with their personal data.

Such parties are: Google Analytics, Google Ads, Yandex Metrix, Yandex Direct, Facebook AdsManager, LinkedIn.

### **3. Exercise of personal data subjects' rights.**

3.1 The user has the right:

3.1.1 To receive information relating to the processing of personal data, namely

- ✓ the name and location of the operator;
- ✓ confirmation of the processing of personal data;
- ✓ his/her personal data and the source of obtaining it;
- ✓ the legal basis and the purpose of personal data processing;
- ✓ the period for which his consent is given;
- ✓ name and location of the authorized person, which is a state body, legal entity of the Republic of Belarus, other organization, if the processing of personal data is entrusted by SBH Law Offices to such person.

SBH Law Offices shall, within 5 working days of receiving the request, provide the User with the above information or notify the User of the reasons for refusing to provide it.

3.1.2. To amend their personal data if the personal data is incomplete, outdated or inaccurate.

The User shall enclose with their request the relevant documents and/or duly certified copies thereof confirming the need to amend their personal data.

SBH Law Offices shall, within 15 days of receiving the request, make the relevant changes and notify the User thereof or notify the User of the reasons for refusing to make such changes.

3.1.3 To obtain information on the provision of personal data to third parties once per calendar year free of charge.

SBH Law Offices shall, within 15 days of receiving the request, provide the User with information about which personal data of the User and to whom it has been provided during the year preceding the date of application, or notify the User of the reasons for refusing to provide it.

*3.1. To request the free cessation of the processing of personal data and/or its deletion.*

SBH Law Offices shall, within 15 days of receipt of the request, terminate the processing of personal data and carry out the deletion of the personal data (ensure the termination of the processing of personal data as well as its deletion by authorised persons, if any) and notify the User of this.

If SBH Law Offices does not have the technical possibility of deleting personal data, SBH Law Offices shall take measures to prevent further processing of personal data, including blocking it, and shall notify the User of this in the same term.

SBH Law Offices shall be entitled to refuse to satisfy the User's request to terminate the processing of their personal data and (or) their deletion if there are grounds for the processing of personal data provided by law, including if they are necessary for the stated purposes of their processing, by notifying the personal data subject thereof within fifteen days.

3.1.5 To appeal against the actions (inaction) and decisions of the operator, which violate the User's rights when processing his personal data, to the National Centre for Personal Data Protection of the Republic of Belarus in the manner prescribed by law.

3.2 In order to realise the rights referred to in sections 3.1.1 to 3.1.5 the User shall submit to the Operator an application in written form or in the form of an electronic document, which shall include

- ✓ The User's surname, first name, patronymic (if any) and address of residence (place of stay);
- ✓ Date of birth of the User;
- ✓ The User's identification number or, in the absence of such number, the number of an identification document if such information was provided by the User when giving its consent to SBH Law Offices;
- ✓ A statement of the nature of the User's claim;
- ✓ The User's personal signature or electronic digital signature.

SBH Law Offices shall provide the User with a response to the application in a form corresponding to the application form, unless otherwise stated in the application itself.

3.3 The User shall also have the right to withdraw their consent at any time without giving a reason by submitting an application to SBH Law Offices in the manner described in clause 3.2 of this Policy or in the form by which their consent is obtained.

SBH Law Offices shall, within 15 days of receipt of the application in accordance with its contents, terminate the processing of personal data and carry out the deletion of the personal data (ensure the termination of the processing of personal data as well as its deletion by authorised persons, if any) and notify the User of this.

If SBH Law Offices does not have the technical possibility of deleting personal data, SBH Law Offices will take measures to prevent further processing of personal data, including blocking it, and will notify the User of this within the same period.

SBH Law Offices shall have the right to refuse to satisfy the User's request for the termination of the processing of their personal data and/or their deletion if there are grounds for the processing of personal data provided by law.

#### **4. New Revisions**

4.1 SBH Law Offices reserves the right to make changes to this Policy. All changes to the Policy will be published online and, if the changes are material, we will notify you.

4.2 A new version of the Policy will take effect as soon as it is posted on the Website.

## **5. Contacts of the operator**

SBH Law Offices LLC is located at 8-3n Storozhevskaya Street, Minsk, 220002, Belarus.

Mobile phone: +375 44 515 21 23

City phone: 80172594649

E-mail: [BY@sbh-partners.com](mailto:BY@sbh-partners.com)