

PERSONAL DATA PROCESSING POLICY

CHAPTER 1 GENERAL PROVISIONS

1.1. The Personal Data Processing Policy of Astroengineering LLC (hereinafter referred to as the Policy) defines the basic principles, objectives and legal grounds for the processing of personal data, the categories of personal data subjects whose data are processed, the list of personal data processed, the procedure and terms for processing personal data, as well as the rights of personal data subjects in the sphere of processing personal data, and is aimed at ensuring the transparency of the personal data processing.

1.2. The following terms and definitions are used in this Policy:

Automated processing of personal data means processing of personal data by computer;

Biometric personal data means information that characterizes the physiological and biological features of a person, which is used for his unique identification (fingerprints, handprints, iris of the eye, facial characteristics and image, and others);

Blocking of personal data means termination of access to personal data without deletion;

Genetic personal data means information relating to a person's inherited or acquired genetic characteristics, which contains unique data on their physiology or health and can be identified, inter alia, by research of their biological sample;

Depersonalization of personal data means actions that make it impossible to determine the belonging of personal data to a specific Data Subject without the use of additional information;

Processing of personal data means any act or set of actions performed with personal data, including collection, systematization, storage, modification, use, depersonalization, blocking, dissemination, provision, deletion of personal data;

The Operator is Astroengineering Technologies LLC registered by Minsk City Executive Committee on 21.03.2019 under No.193227458, which arranges and (or) performs the processing of personal data;

Personal data mean any information relating to an identified individual or individual who can be identified;

Provision of personal data means actions aimed to provide a certain person or a number of persons with access to the personal data;

Dissemination of personal data means actions aimed to provide an indefinite number of persons with access to the personal data;

Special personal data mean personal data relating to race or nationality, political views, membership of labor unions, religious or other beliefs, health or sexual life, administrative or criminal liability, as well as biometric and genetic personal data;

Personal data subject is an individual whose personal data is processed;

Cross-border transfer of personal data means transfer of personal data to the territory of a foreign state;

Deletion of personal data means actions that make it impossible to restore personal data in information resources (systems) containing personal data and (or) actions resulting in physical destruction of the personal data material carriers;

Authorized person means a state body, a legal entity of the Republic of Belarus, other organization or an individual, which in accordance with the act of legislation, the decision of the state body being the Operator, or, on the basis of a contract with the Operator, processes personal data on behalf of or for the Operator;

An individual who can be identified is the individual who can be identified directly or indirectly, inter alia, through the name, date of birth, identification number or one or more characteristics of their physical, psychological, intellectual, economic, cultural or social identity.

1.3. This Policy is based on the Constitution of the Republic of Belarus, the Law of the Republic of Belarus “On Personal Data Protection” dd. 07.05.2021 99-3 (hereinafter referred to as the Law), and other acts of legislation, and developed in accordance with the Guidelines for the Preparation of a Document Defining the Policy of the Operator (Authorized Person) in relation to the Processing of Personal Data published by the National Personal Data Protection Center in the public domain on the Internet.

1.4. This Policy shall apply to the Operator’s business processes related to his economic activity (relations in the sphere of labor and business activity, electronic document management, catering of the employees, corporate management, public safety and other public relations in accordance with the stated purposes of the personal data processing).

1.5. Further to this Policy, the Operator has developed the following:

Personal Data Registry (Annex 1 to the Policy);

Employee’s consent to the processing of personal data (Annex 2 to the Policy).

1.6. The Operator provides unrestricted access to the documents that define the Operator’s Policy regarding the processing of personal data. The Policy is to be posted on the Operator’s official public website on the Internet, as well as on a shared file server.

CHAPTER 2 PRINCIPLES OF PERSONAL DATA PROCESSING

2.1. The personal data processing is performed by the Operator considering the need to avoid discrimination, as well as to protect the rights and freedoms of the personal data subjects, including the right to privacy, personal, family and other legally protected secrets.

2.2. The Operator processes personal data based on the following fundamental principles:

Processing of personal data is legal and fair;

Processing of personal data is commensurate with the stated purposes and ensures a fair balance of interests of all interested persons at all stages of such processing;

Processing of personal data is carried out with the consent of the subject, except for cases stipulated by the Law and other legislative acts;

Processing of personal data is limited to the achievement of specific previously stated lawful purposes;

Processing of personal data that is not compatible with the originally stated purposes is not allowed;

The content and scope of the personal data processed correspond to the stated purposes of their processing;

Processed personal data should not be redundant in relation to the stated purposes of processing;

Processing of personal data is transparent;

Information relating to the personal data processing shall be made available to the subject whose personal data are processed in the cases provided for by the Law;

The Operator takes measures to ensure the reliability of the personal data processed and, if necessary, updates them;

Personal data are stored in a form that allows identification of the personal data subject no longer than the stated purposes of personal data processing require.

CHAPTER 3 PURPOSES OF PERSONAL DATA PROCESSING

3.1. The processing of personal data by the Operator is carried out for the following purposes:

consideration of resumes (questionnaires) of applicants for vacant positions;

registration (admission) to work;

certification of employees;

payment of wages, remuneration for fulfilling obligations related to adherence of trade secrets, payment of average earnings during vacation, travel expenses, vacation compensation, temporary disability benefits;

regulation of labor relations (amendment and termination of an employment contract, provision of labor and social leave, etc.);

keeping records of actual working hours and time spent at the workplace;

protection against unauthorized access to the territory and (or) to the Operator's office;

maintaining military records;

preparation of documents for the implementation of state social insurance;

preparation of documents for individual (personal) accounting of insured persons, which served as the basis for calculating pensions;

referral for professional training, advanced training, internship and retraining;

bringing employees to disciplinary responsibility, participation in the settlement of labor disputes;

investigation of labor accidents;

ensuring information security of data constituting the Operator's trade secret;

ensuring the exchange of electronic messages;

organization of electronic document management and provision of the Operator's business activities through the 1C: Document Management system;

provision of the Operator's activities in the field of accounting and tax accounting, human resources management through the 1C: Salary and Personnel Management system;

preparation of draft legal documents (powers of attorney, contracts, administrative documents, etc.) and legal support of the Operator's business activities;

legal support of corporate governance;

advising employees and (or) preparing legal opinions;

consideration of appeals of citizens and legal entities, requests of state bodies (organizations);

personal congratulations on the Head's birthday, informing the Operator's Head about the birthdays of colleagues;

catering of employees (accounting of purchased products, provision of discounts, provision of payments and (or) deductions from wages);

organization of acquaintance with the hired employees by sending questionnaires of the relevant employees to the Operator's employees;

organization of educational, industrial, pre-graduate and other types of practice;

ensuring participation in scientific conferences by registering, informing about changes in the event program, sending reminders about the event, sending notifications and answering questions.

3.2. Processing of personal data that is incompatible with the originally stated purposes of its processing is not allowed.

3.3. If it is necessary to change the stated purposes of personal data processing, the Operator is obliged to obtain the Data Subject's consent to the processing of their personal data in accordance with the changed purposes of personal data processing in the absence of other grounds for such processing provided by the Law and other legislative acts.

3.4. The purposes of personal data processing stated by the Operator are subject to reflection in the Personal Data Registry (Annex 1 to the Policy).

CHAPTER 4 LEGAL GROUNDS FOR PERSONAL DATA PROCESSING

4.1. The processing of personal data by the Operator is carried out with the consent of the Data Subject (par. 3 of Article 4, Article 5 of the Law), except for the cases provided for by this Policy, the Law, and other legislative acts.

4.2. The processing of personal data by the Operator, with the exception of special personal data, is carried out without obtaining the consent of the Data Subject in cases where, with respect to the relevant purpose of personal data processing, the legal basis for such processing is:

administration of justice, execution of court decisions and other executive documents (par. 3 of part 1 of Article 6 of the Law);

maintaining individual (personal) records of information on insured persons for the purposes of state social insurance, including occupational pension insurance (par. 7 of part 1 of Article 6 of the Law);

registration of labor (official) relations, as well as processing of personal data in the course of labor (official) activity of the Data Subject in cases provided for by law (par. 8 of part 1 of Article 6 of the Law);

appointment and payment of pensions and benefits (par. 11 of part 1 of Article 6 of the Law);

receipt of personal data by the Operator on the basis of an agreement concluded with the Data Subject for the purpose of performing actions established by this agreement (par. 15 of part 1 of Article 6 of the Law);

processing of personal data, when they are indicated in a document addressed to the Operator and signed by the Data Subject, in accordance with the content of such document (par. 16 of part 1 of Article 6 of the Law);

the processing of personal data is necessary to fulfill the duties (powers) provided for by legislative acts (par. 20 of part 1 of Article 6 of the Law).

4.3. The processing of special personal data by the Operator is carried out without obtaining the consent of the Data Subject in cases when, in relation to the relevant purpose of personal data processing, the legal basis for such processing is:

registration of labor (official) relations, as well as processing of personal data in the course of labor (official) activity of the Data Subject in cases provided for by the law (par. 3 of clause 2 of Article 8 of the Law);

the processing of special personal data is necessary to fulfill the duties (powers) provided for by the legislative acts (par. 16 of clause 2 of Article 8 of the Law).

4.3. The legal grounds for processing personal data by the Operator in relation to each specific stated purpose of such processing are subject to indication in the Personal Data Registry (Annex 1 to the Policy).

4.4. If the processing of personal data by the Operator is necessary to fulfill the duties (powers) provided for by the legislative acts (par. 20 of part 1 of Article 6 of the Law, par. 16 clause 2 of Article 8 of the Law), in the Registry of Personal Data (Annex 1 to the Policy), as the legal basis for processing, it is additionally subject to indication a specific legislative act and (or) its structural element providing for the corresponding duty (authority).

4.5. In relation to clause 4.4 of the Policy, legislative acts acting as legal grounds for processing personal data by the Operator, among other things, are as following:

Civil Code of the Republic of Belarus;

Code on Education of the Republic of Belarus;

Labour Code of the Republic of Belarus;

Decree of the President of the Republic of Belarus No. 5 of 15.12.2014 “On Strengthening the Requirements for Managers and Employees of Organisations”;

The Law of the Republic of Belarus No. 1596-XII of 17.04.1992 “The Pensions Act”;

The Law of the Republic of Belarus No. 1914-XII of 05.11.1992 “On military duty and military service”;

The Law of the Republic of Belarus No. 230-3 of 06.01.1999 “On individual (personalized) accounting in the state social insurance system”;

The Law of the Republic of Belarus No. 175-3 of 08.11.2006 “On security activities in the Republic of Belarus”;

The Law of the Republic of Belarus No. 300-3 of 18.07.2011 “On appeals of citizens and legal entities”;

The Law of the Republic of Belarus No. 16-3 of 05.01.2013 “On commercial secrets”;

Decree of the President of the Republic of Belarus No. 40 of 16.01.2009 “On the Social Protection Fund of the Ministry of Labor and Social Protection”;

other legislative acts in the field of control (supervisory) activities, as well as criminal, administrative, civil and economic processes, and manufactures.

CHAPTER 5

CATEGORIES OF SUBJECTS WHOSE PERSONAL DATA ARE PROCESSED AND LIST OF PROCESSED PERSONAL DATA

5.1. The content and scope of the personal data processed by the Operator shall be in accordance with the stated purposes of their processing, stipulated by the Policy and the Personal Data Registry (Annex 1 to the Policy).

5.2. The Operator processes personal data regarding the following categories of the personal data subjects:

Participants, Director, Auditor;
 Affiliated and interdependent persons;
 Visitors;
 Representatives of state bodies (organizations);
 Counterparty representatives;
 Employees and their certain categories (management, top management);
 Employees liable for military service;
 Job seekers;
 Students;
 Individuals, representatives of legal entities and state bodies (organizations) exercising the right to apply to the Operator.

5.3. The categories of subjects whose data are processed, as well as the list of processed personal data for each specific stated purpose of processing, are to be specified in the Personal Data Registry (Annex 1 to the Policy).

5.4. The Operator does not process genetic personal data or special personal data relating to race, nationality, political opinion, religious or other beliefs, health or sexual life.

CHAPTER 6 RIGHTS OF PERSONAL DATA SUBJECTS

6.1. Respect for the rights of personal data subjects is a fundamental component of the personal data processing by the Operator.

6.2. The Data Subject has the right:

- to withdraw the consent to the processing of personal data;
- to receive information relating to the processing of personal data;
- to change personal data;
- to receive information on the provision of personal data to third parties;
- to request termination of processing personal data and (or) their deletion;
- to appeal against actions (omissions) and decisions of the Operator related to the personal data processing.

6.3. The Data Subject is entitled to exercise their right to withdraw the consent at any time and without explaining the reasons by submitting an appropriate application to the Operator. In accordance with the contents of the application received, the Operator is obliged to stop processing the relevant personal data, to delete them or if it is technically impossible, to take measures preventing the further processing of personal data, including their blocking, and notify the Data Subject about this, unless there are other grounds for certain actions in relation to personal data provided by the Law and other legislative acts.

6.4. The Data Subject can exercise their right to receive information relating to the personal data processing by submitting an appropriate application to the Operator. In this case, the Data Subject may not justify his interest in the requested information.

The requested information may include:

- name and location of the Operator;
- confirmation of the personal data processing by the Operator (authorized person);
- personal data of the Data Subject and the source of their receipt;
- the legal grounds and purposes for the personal data processing;
- the period for which the Data Subject's consent is given;

name and location of the authorized person if the processing of personal data is entrusted to such person;

other information provided by the law.

This information shall be provided to the Data Subject on a free basis, except in cases provided for by the legislative acts.

6.5. The Data Subject has the right to make changes to their personal data if the personal data are incomplete, outdated or inaccurate. For this purpose, the Data Subject submits to the Operator an application with the relevant documents and (or) their duly certified copies, confirming the need to make changes to the personal data.

6.6. Once in a calendar year, the Data Subject has the right to receive information on the provision of the personal data to third parties on a free basis, unless otherwise provided by the law and other legislative acts, by applying to the Operator.

6.7. The Data Subject has the right to demand from the Operator on a free basis to terminate processing of the personal data, including their deletion, if there is no reason to process such personal data as stipulated by the Policy, the Law and other legislative acts, by applying to the Operator. In the case referred to in this paragraph, the Operator is obliged to stop processing of the relevant personal data, to delete them (to ensure that the personal data processing is stopped and that they are deleted by an authorized person) or if the data deleting is technically impossible, to take measures preventing the further processing of personal data, including their blocking, and notify the Data Subject about this.

The Operator has the right to refuse in satisfying the Data Subject's requirements on termination of processing of the personal data and (or) their deletion if there are grounds for the personal data processing stipulated by the Policy, Law and other legislative acts, including if they are necessary for the stated purposes of their processing, and should notify the Data Subject about this.

6.8. For protection of their rights, the Data Subject can appeal the Operator's actions (omissions) and decisions violating their rights during the processing of personal data to the authorized body that is the National Personal Data Protection Center of the Republic of Belarus, according to the procedure established by the legislation on appeals of citizens and legal entities. The decision taken by the authorized body for the protection of the Data Subject's rights may be appealed to the court by the Data Subject in accordance with the procedure established by the law.

6.9. For the realization of the rights provided for in par. 6.2 of the Policy, except for the right to appeal the Operator's actions (omissions) and decisions related to the personal data processing, the exercise procedure of which is prescribed in par. 6.8 of the Policy, The Data Subject may apply to the Operator in writing or in the form of an electronic document.

In accordance with Article 1 of The Law of the Republic of Belarus dd. 28.12.2009 113-3 "On electronic document and electronic digital signature", an electronic document is the document in electronic form with the details, allowing to establish its integrity and authenticity, which are evidenced by the use of certified electronic digital signature means and the electronic digital signature public verification key of the Data Subject who signed the electronic document.

An application by the Data Subject must contain the following information:

surname, first name, patronymic (if any) of the Data Subject;

address of the Data Subject's place of residence;

date of birth of the Data Subject;

identification number of the Data Subject, and in the absence of such number, the number of the document certifying the identity of the Data Subject, in cases when this

information was disclosed by the Data Subject while giving their consent to the Operator or the processing of personal data is carried out without the consent of the Data Subject;
delivering the Data Subject's requirements;
personal signature or electronic digital signature of the Data Subject.

The application in writing is submitted to the Head of the Operator by courier or post at: 220089, 33 Zheleznodorozhnaya Str., office 3, 4th fl., Minsk.

The application in the form of an electronic document can be submitted by sending to the e-mail address of the Operator: info@aet.space. When the application is in the form of an electronic document, it is mandatory to attach to the said application a public key used to verify the electronic digital signature of the Data Subject.

The response to the application shall be sent to the Data Subject in a form corresponding to the form of the application submission, unless the application itself specifies otherwise.

6.10. The Data Subject may request assistance in the exercise of their rights from the person responsible for internal control over the personal data processing in the organizational and legal area.

6.11. The Data Subjects are obliged to immediately inform the Operator and (or) the persons responsible for the implementation of internal control over the personal data processing about the facts of violation of personal data protection systems that have come to their knowledge and resulted in the illegal distribution, provision or alteration, as well as blocking or deletion of personal data without the possibility of restoring access to them.

6.12. In all other matters that are not regulated by the provisions of this chapter, including the time frame for consideration of the applications and the grounds for satisfying or refusing them, the provisions of the Law and other legislative acts must be applied.

CHAPTER 7

PROCEDURE AND CONDITIONS FOR PROCESSING PERSONAL DATA

7.1. The Operator processes personal data by collecting, systematizing, storing, modifying, using, depersonalizing, blocking, distributing, providing, deleting, performing other actions or a combination of actions in compliance with the requirements of this Policy, the Law and other legislative acts.

7.2. The processing of personal data by the Operator is carried out in the following ways:

using automation tools;

without the use of automation tools, if in this case the search for personal data and (or) access to them according to certain criteria (file cabinets, lists, databases, magazines, etc.) is provided.

7.3. The processing of personal data by the Operator is carried out with the consent of the Data Subject, with the exception of cases provided by this Policy, the Law and other legislative acts.

7.4. The source of obtaining personal data for their further processing may be:

subjects of personal data;

legal entities;

governmental authorities (organizations);

documents of a legal nature;

publicly available sources;

other sources, if it does not contradict the laws.

Obtaining personal data for their subsequent processing from illegal sources and (or) by committing illegal actions is not allowed.

7.5. The Operator may entrust the processing of personal data to authorized persons in compliance with the requirements of the law. The specified information is subject to reflection in the Personal Data Registry (Annex 1 to the Policy).

7.6. The Operator takes legal, organizational and technical measures to ensure the protection of personal data from unauthorized or accidental access to them, modification, blocking, copying, distribution, provision, deletion of personal data as well as from other illegal actions in relation to personal data.

7.7. An integral part of this Policy is the Personal Data Registry (Annex 1 to the Policy). The Personal Data Registry contains information on the types of personal data processing, divisions or persons responsible for the processing of personal data, data subjects, categories of personal data, legal grounds for the processing of personal data, categories of external recipients of personal data and the location of personal data in relation to each specific declared purpose of the personal data processing.

7.8. An integral part of this Policy is also the Employee's Consent to the processing of personal data (Annex 2 to the Policy), which is a free, unambiguous, informed expression of the will of the Data Subjects, through which they authorize the processing of their personal data.

7.9. The storage of personal data should be carried out in a form that allows to identify the Data Subject, no longer than the stated purposes of the processing personal data require it. The terms of personal data storage in relation to each specific declared purpose of processing personal data by the Operator are to be reflected in the Personal Data Registry (Annex 1 to the Policy).

CHAPTER 8 CROSS-BORDER TRANSFER OF PERSONAL DATA

8.1. It is not the intention of the Operator to carry out cross-border transfer of personal data on an ongoing basis.

8.2. Cross-border transfer of personal data is allowed in relation to individual personal data (name, corporate phone number, e-mail) of employees whose labor function is associated with the need for their external interaction with third parties, in order to create working groups for the exercise of certain projects and (or) exercise by the Operator of economic activities within the framework of relevant legal documents, mainly of a contractual nature.

The category of subjects of foreign states to which personal data may be transferred, includes contractors and governmental authorities (organizations).

A possible way of communication is according to the data reflected in the relevant legal documents being mainly of a contractual nature as well as on the official websites of these subjects of foreign states.

8.3. Cross-border transfer of personal data may also take place in other cases, if such transfer is related to the exercise and (or) protection of the rights and legitimate interests of the Operator in the territory of a foreign state.

Category of subjects of foreign states to which personal data may be transferred includes judicial, law enforcement, human rights body, advocacy, notaries, enforcement agencies, other state bodies (organizations), participants in judicial and other processes,

other persons contributing to the exercise and (or) protection of the rights and legitimate interests of the Operator in the territory of a foreign state.

A possible way of communication is according to the data reflected in the relevant legal documents as well as on the official websites of these subjects of foreign states.

8.5. The legal grounds for the implementation of cross-border transfer of personal data are:

legal foundations provided in paragraph 3 of art. 4, art. 5, par. 3, 8, 15, 20 of art. 6, par. 3, 6, 16 of art. 8 of the Law, other foundations provided by the Law and legislative acts in the event of a cross-border transfer of personal data to the territory of a foreign state, ensuring an adequate level of protection of the Data Subjects' rights;

legal foundations provided in paragraph 1 of art. 9 of the Law in the event of a cross-border transfer of personal data to the territory of a foreign state, while not ensuring an adequate level of protection of the Data Subjects' rights.

8.6. When carrying out cross-border transfer of personal data, the Operator will proceed from the need to strictly comply with the principles of processing personal data as well as the rules for cross-border transfer of data provided by the Law, other legislative acts, orders of the director of the National Personal Data Protection Center of the Republic of Belarus.

CHAPTER 9 INTERNAL CONTROL OF PERSONAL DATA PROCESSING

9.1. The internal control of the personal data processing by an Operator is carried out by the person responsible for exercising internal control over the personal data processing.

Both structural divisions and individual Operators' employees may act as persons responsible for exercising internal control over the personal data processing.

9.2. Persons responsible for actualization of internal control over the personal data processing are appointed considering knowledge of the legislation on personal data and the practice of its application, an understanding of the Operator's business processes in which personal data are used, an understanding of the information systems used by the Operator and their protection. The legal basis for the appointment of persons responsible to exercise the internal control is the Operator's manager order.

9.3. The person responsible for actualizing internal control over the processing of personal data performs the following functions:

- advising the manager and employees on personal data legislation;
- development and maintenance of up-to-date documents defining the Operator's policy regarding the processing of personal data;
- coordinating the maintenance of the registry of personal data processing;
- training of employees involved in personal data processing on the protection of personal data;
- consideration of applications of the Data Subjects;
- interaction with the authorized body for the protection of the Data Subjects' rights that is the National Personal Data Protection Center of the Republic of Belarus;
- systematization of the facts of providing personal data to third parties;
- determination and maintenance of information resources (systems) list containing personal data, the owner of which is the Operator, the categories of personal data to be included in such resources (systems), the list of authorized persons, if the personal data

processing is carried out by authorized persons, terms of storage of processed personal data;

entering into the state information resource of the National Personal Data Protection Center "Personal Data Operators Register" in the manner prescribed by the law, knowledge about information resources (systems) containing personal data, as well as ensuring that the relevant knowledge is updated;

establishing the procedure for access to personal data, including those processed in the information resource, agreeing on the provision of such access, recording and storing information about persons who have and (or) received access to personal data;

ensuring an appropriate information security system, technical and cryptographic protection of personal data;

immediately informing the Operator's manager and the person responsible for exercising internal control over the personal data processing in terms of the organizational and legal part of the facts of violation of personal data protection systems that led to the illegal distribution, provision of personal data or their change, blocking, deletion without the possibility of restoring the access to him;

other functions that ensure the exercise of internal control over the processing of personal data.

9.5. The Operator organizes training of persons responsible for internal control over the processing of personal data on the protection of personal data in the manner prescribed by the law.

9.6. Violation of the legislation requirements in the field of personal data processing entails civil, administrative and criminal liability as well as the application of disciplinary measures.

9.7. The appointment of persons responsible for exercising internal control over the processing of personal data is not a basis for releasing the Operator, an authorized person and (or) Operator's employees from the liability provided by the law for their violations of the legislation requirements in the field of personal data processing.