Approved by

Minutes No.8 of the meeting of the primary trade union organization of the healthcare institution the “25th City Children’s Outpatient Clinic” as of May 18, 2022

Personal Data Processing Policy

of the primary trade union organization

of the health care institution the

“25th City Children’s Outpatient Clinic”

1. This Policy shall set the activities of the primary trade union organization (hereinafter referred to as the Trade union organization) of the health care institution the “25th City Children’s Outpatient Clinic” relating to personal data processing and protection in accordance with Article 17 of Law No.99-З of the Republic of Belarus as of May 7, 2021 “On Personal Data Protection” (hereinafter referred to as the Law).

The approval of the Personal data processing policy (hereinafter referred to as the Policy) of the Trade union organization shall be deemed to be a measure taken to protect personal data according to Article 17 of the Law.

The Policy shall clarify to the personal data subjects the goals and methods of collection, use and processing of their personal data, and the rights of the personal data subjects arising in connection with collection and processing of their personal data and the procedure for the execution of such rights.

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2. The Primary trade union organization shall process personal data in the following cases:

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| Goals of personal data processing | Categories of personal data subjects whose personal data is to be processed | List of personal data to be processed | Legal grounds for personal data processing |
| 1 | 2 | 3 | 4 |
| Recording of the members of the trade union: admission to the trade union, registration in the trade union. | Individuals who applied in writing for the admission to or registration in the trade union. | Full name, date of birth, job title (occupation), place of work | Consent of the personal data subject (attached) |
| Conduction of statutory events (meetings, conferences, meetings of superior trade union bodies and authorities) | Individuals participating in the events | Full name, date of birth, job title (occupation), place of work, contact phone number | Consent of the personal data subject |
| Protection of labour, social and economic rights of the members of the trade union, including action on behalf of a trade union member before an employer, consultations, admission, execution of proceedings, representation before the court. | Individuals who apply for the protection of labour, social and economic rights.  Other individuals, whose personal data is specified in the application. | Full name, residential address (address of stay), other personal data.  Personal data of any third persons, processed in the course of protection of labour, social and economic rights. | Personal data shall be processed to perform the obligations (powers) specified in the legal acts  (paragraph 6 and paragraph 15 of item 2 of Article 8 of the Law, Article 10 and part 3 of Article 19 of Law “On Trade Unions”, Articles 72 and 85, part 1 of Article 86 of the Code of Civil Procedure of the Republic of Belarus). |
| Public control | Individuals whose personal data is processed by the trade union organization and in respect to whom the measures of public control are to be taken. | Personal data of the individuals processed by the trade union organization in respect to whom the measures of public control are to be taken in accordance with the issues to be revised and monitored. | Personal data shall be processed to perform the obligations (powers) specified in the legal acts  (Order No.240 of the President of the Republic of Belarus “On public control of trade unions” as of May 6, 2010, Labour Code of the Republic of Belarus, Law of the Republic of Belarus “On Occupational Safety”. |

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| Consideration of applications, including those from the customer comment book. | Individuals who submitted applications.  Other individuals, whose personal data is specified in applications. | Full name, residential address (address of stay), essence of application, contact phone number, other personal data specified in the application and contained in the documents attached to the application. | Consideration of applications relating to labour, social and economic issues:  Personal data shall be processed to perform the obligations specified in the legal acts.  (paragraph 20 of Article 6 and paragraph 16 of item 2 of Article 8 of the Law, item 1 of Article 3 of Law of the Republic of Belarus “On Applications of Citizens and Legal Entities” (hereinafter referred to as the Law on applications).  Consideration of other applications (except for the labour, social and economic issues):  Consent of the personal data subject and paragraph 16 of Article 6 of the Law. |
| Arrangement of personal appointments | Individuals who apply for a personal appointment | Full name, contact phone number, issue | Personal data shall be processed to perform the obligations (powers) specified in the legal acts  (paragraph 20 of Article 6 of the law, item 7 of Article 6 of the Law on applications |
| Execution and performance of civil contracts not relating to main obligations of the trade union (for instance, sales contracts, contracts of service, etc.). | Individuals authorized to sign contracts. | Full name and job title of the person who signed the contract, other data in accordance with the contract (if necessary). | 1. If a contract with an individual is made, personal data shall be processed in accordance with the contract with the personal data subject (paragraph 15 of Article 6 of the Law). 2. If a contract with a legal entity is made, personal data shall be processed to perform the obligations (powers) specified in the legal acts (paragraph 20 of Article 6 and paragraph 16 of item of Article 8 of the Law, Article 49, item 5 of Article 186 of the Civil Code of the Republic of Belarus). |
| Holding of sports events, sports event insurance. | Individuals, who participate in sports events. | Full name, date of birth, passport details, residential address (address of stay), job title (occupation). | Consent of the personal data subject |
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| 1 | 2 | 3 | 4 |
| Holding of cultural events. | Individuals, who participate in cultural events. | Full name, date of birth, passport details, residential address (address of stay), place of work, job title (occupation), contact phone number. | Consent of the personal data subject |
| Holding of competitions, amateur talent contests, contests. | Individuals, who participate in competitions, amateur talent contests, contests. | Full name, place of work, job title (occupation), passport details, bank account details (if a money reward is paid). | Consent of the personal data subject |
| Participation in excursions and holiday trips. | Individuals, who go on trips. | Full name, passport details, including date of issue, issuing authority, residential address (address of stay) to check in hotels or travel abroad. | Consent of the personal data subject |
| Training of the trade union members, social occupational safety inspectors, young members of the trade union. | Individuals, who undergo trainings | Full name, passport details, residential address (address of stay), job title/occupation. | Consent of the personal data subject |
| Publishing of information on mass media, social media, information stands, websites of the trade union, its organizational structures, federation of trade unions of Belarus and organizational structures of the federation of trade unions of Belarus. | Individuals information about whom is published. | Full name, place of work, job title (occupation), photos and videos. | Consent of the personal data subject |
| Consideration of individual labour disputes. | Employees who are the parties to an individual labour dispute. | Passport details (full name, gender, etc.), employment data, other data required to settle an individual labour dispute. | Article 235 of the Labour Code, Consent of the personal data subject |

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| Provision of benefits and guarantees specified in  the collective employment agreement:  upon application  without application | Individuals, who are entitled to get benefits and guarantees pursuant to the collective employment agreement. | Full name, other personal data specified in the application for the provision of benefits and guarantees.  Full name, place of work, job title (occupation) (for employees), residential address (address of stay), bank account details (for other individuals). | Paragraph 16 of Article 6 of the Law  Consent of the personal data subject |
| Encouragements (gratitudes, trade union and FTUB awards). | Individuals, who get encouragements | Full name, date of birth, job title (occupation), education details, work experience, encouragement details, bank account details (if a money reward is paid), work experience in the trade union organization, types of trade union awards, other data contained in award sheets. | Consent of the personal data subject |
| Nomination of delegates to conferences, meetings, candidates to governing authorities of the trade union, its organizational structures, FTUB and organizational structures of FTUB. | Individuals nominated as the delegates. | Full name, place of work. | Consent of the personal data subject |

1. The Trade union organization shall process only the data that is required to perform the stated goals and shall avoid extra processing of personal data.
2. The trade union organization shall store personal data in such a way so that to identify a personal data subject and within the period required to achieve the stated goals of personal data processing.
3. The Trade union organization shall not transfer personal data to any third parties without consent of a personal data subject except where provided for by the legal acts.
4. A personal data subject shall be entitled to:
   1. withdraw its consent for personal data processing previously provided to the trade union organization. Such consent shall not be withdrawn, if personal data is processed under a relevant contract or pursuant to the laws (for instance, in case of public control or consideration of a submitted application);
   2. get information relating to processing of its personal data by the trade union organization, i.e.

location of the trade union;

confirmation of processing of its personal data by the trade union organization;

its personal data and source of such data;

legal grounds and goals of personal data processing;

term of its consent (if personal data is processed with the consent of a personal data subject);

other information in accordance with the laws.

* 1. require the trade union organization to amend its personal data, if such data is incomplete, outdated or inaccurate. In this case a personal data subject shall provide the documents, confirming the necessity to amend its personal data, and (or) duly certified copies of such documents to the trade union organization;
  2. receive information on the provision of it personal data to any third parties by the trade union organization. A personal data subject shall be entitled to obtain such information once in a calendar year for free;
  3. require to terminate processing of its personal data on a free basis, including deletion of personal data except where personal data processing is required by the Law or legal acts;
  4. appeal to the court against any actions (omissions) and decisions of the trade union organization which violate its rights with regard to personal data processing in accordance with the procedure set forth by the Law of Civil Procedure.

1. To execute its rights relating to personal data processing a personal data subject shall submit to the trade union a written or an electronic application by mail or email, specified in part 5 of item 1 of this Annex (an application for withdrawal of consent shall be submitted in the same form and manner as the consent was submitted). Such application shall contain:

a personal data subject’s full name, residential address (address of stay);

date of birth;

essence of a claim;

a personal data subject’s ID number. If a personal data subject has no ID number, an ID number of its identification document provided that the personal data has provided such data upon provision of its consent or if personal data is processed without consent of the personal data subject;

a personal data subject’s signature (for written applications).

1. If personal data subjects need assistance in execution of their rights, they may submit by email a relevant application to a person responsible for the internal control of personal data processing.