

Video Surveillance Policy of VFS BY LLC

(dd. 31.07.2023)

CHAPTER 1

GENERAL PROVISIONS

1. This Video Surveillance Policy (hereinafter referred to as the Policy) was developed on the basis of the Regulations on Video Surveillance approved by the director of VFS BY Limited Liability Company (hereinafter referred to as the Organization).

2. Adoption of the Policy is one of the measures taken by the Organization to protect personal data, provided for in 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).

3. The Policy explains to the subjects of personal data how and for what purposes their personal data are collected, used or otherwise processed, and also reflects the rights of the subjects of personal data in connection with this and the mechanism for their implementation.

4. If any questions arise regarding the implementation of this Policy or the requirements of legislation in this area, the subject of personal data may refer for an appropriate explanation to the Data Protection Officer (DPO):

VFS BY LLC, Republic of Belarus, 220006, Minsk,
st. Bobruisk. 6/7 (Shopping center "Galileo", 5th floor);
Internet address: <https://vfsglobal.by>;

or use the Privacy Request Form, located at <https://privacyportalde-cdn.onetrust.com/dsarwebform/0f1f48b5-2d1c-4db6-b608-3788fc2ccd6c/4bb63f4e-5bdb-4a1b-a325-148c0a72a7f7.html>.

5. The Policy uses terms and definitions that have the meaning specified in the Law.

6. This Policy applies to all structural divisions of the Organization, including visa application centers located in the regional offices of the Organization.

CHAPTER 2

PURPOSE AND LEGAL GROUNDS FOR VIDEO SURVEILLANCE

7. The Organization does not perform audio recording of the voice, as well as unique identification of persons, captured on the video recordings.

8. Video surveillance is carried out for the execution of obligations (powers) provided for by legislative acts:

for ensuring production and technological, executive and labor discipline, monitoring compliance with a certain procedure for storing documents, material and money values, in particular, for the safety of documents, handed over to the missions (including identity documents, travel documents, etc.), biometric data, cash;

for protection of individuals (including employees of the Organization, visitors), Organization's assets from illegal actions, for execution of rights and freedoms of individuals;

for protection of personal data being processed, information, containing secrets protected by law, as well as to control visitor access to the Organization.

9. Video surveillance in the Organization is carried out without the consent of personal data subjects.

10. Video surveillance is carried out in all visa centers of the Organization (hereinafter - VAC).

11. In the public area surveillance cameras cover the waiting area (the space where visitors sit), service counters, biometric data collection counters, information counters and other public areas of the VAC.

12. Surveillance cameras are not placed in such premises as rest and dining rooms (kitchen), changing rooms and toilet facilities on the territory of the Organization.

13. Surveillance cameras are placed in such a way so as to be clearly visible.

14. Surveillance cameras perform recording 24 hours a day, 7 days a week.

15. The period of storage of video recordings should not exceed 30 days (with the exception of cases, when there are grounds for their storage for a longer period, for example, when investigating the accidents, illegal actions). After expiration of 30 days information is automatically deleted (overwritten with new information).

16. At the entrance to the Organization's premises, as well as near each video surveillance camera installed in the premises of the Organization, information signs are found warning about video surveillance.

CHAPTER 3

RIGHTS OF PERSONAL DATA SUBJECTS AND THE MECHANISM OF THEIR IMPLEMENTATION

17. The subject of personal data has the right:

to receive from the Organization, acting as the controller, information regarding the processing of their personal data;

require from the Organization, acting as the controller, to make changes to their personal data if the personal data are incomplete, outdated or inaccurate;

receive from the Organization, acting as the controller, information about the provision of their personal data to third parties once a calendar year free of charge, unless otherwise provided by the legislative acts of the Republic of Belarus;

require from the Organization, acting as the controller, to stop processing their personal data free of charge, including their deletion, in the absence of grounds for the processing of personal data provided for by the legislative acts of the Republic of Belarus;

file appeal against actions (inaction) and decisions of the Organization, acting as the controller, that violate their rights within processing of personal data to the National Personal Data Protection Center in the manner prescribed by legislation on appeals from citizens and legal entities. The decision made by the National Personal Data Protection Center may be appealed by the subject of personal data to the court in the manner prescribed by the legislation of the Republic of Belarus;

exercise other rights provided for by the legislation of the Republic of Belarus, as well as agreements concluded with the Organization.

18. The subject of personal data, in order to exercise their rights, sends an application to the Organization, acting as the controller, in writing or in the form of an electronic document. If applicable, the withdrawal of consent can be carried out in the same form in which consent was provided, and without additional formalities (unsubscribe via e-mail, affixing / unchecking a resource, etc.).

19. The content of the application of the subject of personal data must comply with the requirements of the law. In a written application, the subject of personal data indicates:

surname, first name, patronymic (if any), address of the place of residence (place of stay);

date of birth;

identification number, and in its absence - the number of the identity document, in cases where this information was indicated by the subject of personal data when giving his consent to the controller or when the processing of personal data is carried out without the consent of the subject of personal data;

subject-matter of the request;

personal signature or electronic digital signature of the subject of personal data.

20. Within the time limits established by law, the Organization considers the application of the subject of personal data. Based on the results of consideration, a response is sent to the subject of personal data in the form corresponding to the application form, unless otherwise indicated in the application itself.

21. DPO participates in the consideration of applications of personal data subjects

22. The Organization has the right to refuse the subject of personal data to satisfy the requirements specified in the application, in cases provided for by law.

CHAPTER 4 FINAL PROVISIONS

23. In everything else that is not regulated by the Policy, the provisions of the local legal acts of the Organization and the current legislation of the Republic of Belarus apply.

24. The Organization has the right to make changes and (or) additions to the Policy at any time.

25. This Policy comes into force from the date of its adoption.