

APPROVED by  
Director of Belavtostrada State  
Enterprise

\_\_\_\_\_A.N. Ivanov

\_10\_ November 2021

APPROVED by  
Order of Chairman of the Board of  
Directors of Kapsch Telematic  
Services FLLC  
No.24-00 \_\_ dated \_12\_ November  
2021

## **BelToll Toll Road Users Personal Data Processing Policy**

### **1. General provisions**

1.1. This personal data processing policy (hereinafter – the Policy) stipulates the activities of Kapsch Telematic Services FLLC (hereinafter – the Operator) registered at the address: 8 Kizhevator Street, Office 47, Minsk, in relation to processing of personal data of toll road users in the Republic of Belarus.

1.2. This Policy was developed in pursuance of the Law ‘On personal data protection’ No. 99-3 dated 07.05.2021.

1.3. The terms used in the Law ‘On personal data protection’ have the same meaning in this Policy.

1.4. This Policy covers all actions performed by the Operator in relation to personal data, whether or not using automation means, when personal data are searched and/or accessed according to specific criteria (card files, lists, databases, logbooks, etc.).

### **2. Personal data subject categories and the scope of processed personal data**

2.1. The Operator processes personal data of the following personal data subjects:

Owners of vehicles used to drive on the toll road;

Persons who are parties to the toll road usage agreement;

Persons who represent a party to the toll road usage agreement;

Persons who provided their personal data to enable the function of SMS notification about registered incidents and/or single toll tariff payment in the automated mode;

Persons who provided their personal data in payment for the electronic vignette;

Persons who addressed the support service (Infoline) of the electronic toll collection system in the free multi-lane traffic mode on certain roads of the Republic of Belarus (hereinafter – the ETC-System);

Visitors of the web-site beltoll.by;

Persons who filed and/or signed the claim against accrual and debit of toll for driving the vehicle on toll roads of the Republic of Belarus, including increased rate payment;

Persons who filed and/or signed the application on the issues relating to the ETC-System functioning in hard copy or electronically, and their representatives;

Persons who applied for a personal meeting with the Operator's CEO or an authorized officer empowered by the CEO.

2.2. The Operator processes the following personal data of the personal data subject:

- Personal name, patronymic name, family name;
- E-mail address;
- Postal address;
- Phone number;
- Registration data of the place of residence and/or stay;
- Identification number;
- Sex;
- Day, month, and year of birth;
- Place of birth;
- Citizenship (nationality);
- Personal identification document details;
- Vehicle registration certificate details;
- Other information necessary to facilitate the ETC-System functioning.

Such personal data may be stored in the form of document copies containing personal data, including electronic copies.

The scope of personal data of a certain subject processed by the Operator depends on the personal data subject category according to Article 2.1 hereof.

2.3. The Operator processes personal data for the purpose of facilitating the ETC-System functioning. The Operator ensured compliance of the contents and scope of personal data with the purposes stated herein.

2.4. No consent of the toll road users is required for personal data processing for the purpose of facilitating the ETC-System functioning.

### **3. Main rights and obligations of the Operator and the personal data subject**

3.1. The Operator may:

Receive authentic information and/or documents containing personal data from personal data subjects;

Reject the personal data's request to stop processing its personal data and/or delete them if such processing is required by the legislation, also if they are necessary for the declared purposes of their processing.

3.2. The Operator must:

Process personal data in accordance with the laws of the Republic of Belarus;

Protect personal data during their processing;

Terminate processing personal data, delete or block them (ensure termination of personal data processing and their deletion or blocking by an authorized person) if there are no legal grounds for personal data processing;

Fulfill other obligations stipulated by the laws.

3.3. The personal data subject may:

Demand termination of processing his/her personal data, including their deletion, if there are no legal grounds for their processing;

Duly file a request to the Operator in accordance with the law to amend his/her personal data if they are incomplete, outdated or inaccurate, except when another procedure of personal data amendment is stipulated by the laws, or purposes of personal data processing do not envisage future amendment of such data;

File a claim against actions (omissions) of the Operator that violate his/her rights in relation to personal data processing, to the authority protecting personal data subjects' rights according to the procedure stipulated by the laws;

Enforce other rights stipulated by the laws.

3.4. The personal data subject shall:

Provide authentic information about himself/herself to the Operator.

3.5. The information relating to processing personal data of toll road users is not provided to such users.

3.6. The information relating to provision of personal data of toll road users is not disclosed to third parties.

3.7. The person who provided incomplete, outdated or incorrect information about himself/herself to the Operator, or who provided information about another personal data subject without consent of the latter shall be held liable in accordance with the laws.

#### **4. Procedure and terms of personal data processing**

4.1. The Operator processes personal data without consent of the personal data subject on the basis of subclause 6.3 of clause 6 of the Provision on certain issues of charging the toll for driving vehicles on toll roads of the Republic of Belarus, adopted by Decree of President of the Republic of Belarus No. 426 dated 27 September 2012.

4.2. Personal data processing by the Operator includes the following actions with personal data: collection, arranging, storage, amendment, usage, depersonalization, blocking, distribution, provision, deletion, and other actions stipulated by the law.

4.3. Personal data are stored in the form that allows identification of the personal data subject, but not longer than required by the personal data processing purposes.

4.4. In processing personal data, the Operator undertakes the necessary legal, organizational and technical measures to ensure protection of personal data from unauthorized or occasional access, amendment, blocking, copying, distribution, provision, deletion, or other illegal action in relation thereto.

4.5. Access to personal data is enabled for Belavtostrada State Enterprise, Transport Inspectorate of the Ministry of Transport and Communications of the Republic of Belarus State Enterprise, and issuers of fuel cards that are included into the list adopted by the Ministry of Transport and Communications, in the scope necessary to perform their duties of providing services to toll road users.

#### **5. Final provisions**

5.1. This Policy shall come into force on 15 November 2021.

5.2. The issues relating to personal data processing and not stipulated herein shall be resolved in accordance with the laws.

5.3. The Operator may amend and/or supplement this Policy without prior and/or further notification to personal data subjects. The up-to-date version of the Policy is available on the website <https://beltoll.by/>.