REGULATION
on the Policy Regarding the Processing of Personal Data

1. GENERAL PROVISIONS

1.1. Limited Liability Company "Biyang" (hereinafter, the "Company"), as the developer and publisher of the "Daylight" application (hereinafter, the "Application"), pays special attention to the protection of the personal data of the Application users when processing their personal data and respects the observance of its users' rights.

1.2. The approval of this Regulation on the Policy Regarding the Processing of Personal Data (hereinafter, the "Policy") constitutes one of the measures adopted by the Company to ensure the protection of the personal data of the Application users, as provided for by Article 17 of the Law of the Republic of Belarus No. 99-Z dated 7 May 2021 "On Personal Data Protection" (hereinafter, the "Law").

1.3. The Policy explains to the Application users, i.e., the personal data subjects, how and for what purposes their personal data are collected, used or otherwise processed, and also sets out the rights held by personal data subjects in this regard and the mechanisms for exercising such rights.

1.4. The Policy shall not apply to the processing of personal data in the course of employment and in the course of administrative procedures (in respect of the Company's employees and former employees), as well as to video surveillance.

1.5. The Company's address for correspondence: beyoung.belcrew@gmail.com.

1.6. This Policy uses terms and definitions in the meaning defined by the Law.

1.7. Personal data may be used by the Company for scientific or other research purposes after the mandatory anonymisation (de-identification) of such personal data, in particular, for:

− preparation and publication of annual reports on its activities;
− preparation and issuance of clarifications on the application of personal data legislation;
− preparation and implementation of publications and presentations related to the performance by the Company's employees of their official duties.

1.8. The Application processes only those personal data that are necessary to achieve the stated purposes and does not permit their excessive processing.

2. PURPOSES, CATEGORIES OF PERSONAL DATA SUBJECTS WHOSE DATA ARE PROCESSED, LIST OF PERSONAL DATA PROCESSED, LEGAL GROUNDS AND STORAGE PERIODS FOR PERSONAL DATA

2.1. The Application processes the personal data of personal data subjects for the purposes, in the scope, on the legal grounds, and also stores personal data,

in relation to each category of personal data subjects, in accordance with Appendix 1 to this Policy.

2.2. At the same time, certain personal data of the user, when the user uses the Application, are not processed by the Company. Such data are stored locally on the user's device until the user deletes the Application from the device. The Company has no capability to process such personal data. Such data include:

– data relating to the user's media files: photographs and video recordings from the user's gallery; EXIF data and/or media metadata (for example, GPS coordinates, if present in photographs);

– derived data (if the "faces / collections" functions are enabled in the Application): the results of face detection in photographs; vector representations (embeddings) of faces generated on the user's device, used for grouping (clustering) by faces and/or animals.

3. PROCEDURE AND CONDITIONS FOR PROCESSING PERSONAL DATA

3.1. The Company processes personal data using automation tools by means of collecting, systematising, storing, anonymising (de-identifying), blocking and deleting personal data.

3.2. Personal data shall never and under no circumstances be transferred to third parties, except in cases related to compliance with applicable legislation or where the personal data subject has given the Company consent to transfer the data to a third party.

3.3. Information collected by third-party services, including payment systems and other service providers, is stored and processed by such persons in accordance with their rules and policies. The Company shall not be liable for the actions of such third parties.

3.4. When processing the personal data of the Application users, the Company ensures the confidentiality of such personal data.

3.5. When processing the personal data of the Application users, the Company adheres to the following principles:

– lawfulness and fairness;
– limitation of personal data processing to the achievement of specific, pre-determined and lawful purposes;
– prevention of the processing of personal data incompatible with the purposes for which personal data are collected;
– prevention of excessive processing of personal data in relation to the stated purposes of processing;
– ensuring the accuracy of personal data, their sufficiency and, where necessary, their relevance in relation to the purposes of personal data processing, and taking measures to delete or rectify incomplete or inaccurate data;

- storage of personal data in a form that enables the personal data subject to be identified for no longer than required by the stated purposes of personal data processing.

3.6. The security of personal data processed by the Company is ensured through the implementation of legal, organisational and technical measures necessary to meet the requirements of legislation in the field of personal data protection.

3.7. In order to protect personal data from unauthorised or accidental access, alteration, blocking, copying, dissemination, provision, deletion, and from other unlawful actions in relation to personal data, the Company applies the following measures:

- appointment by the Company of a person responsible for internal control over personal data processing;
- issuance by the Company of documents defining the Company's policy regarding the processing of personal data;
- familiarisation of the Company's employees directly involved in personal data processing with the provisions of personal data legislation, including personal data protection requirements, documents defining the Company's policy regarding the processing of personal data, as well as training of such employees and other persons in accordance with the procedure established by law;
- establishment of a procedure for access to personal data, including personal data processed in an information resource (system);
- implementation of technical and cryptographic protection of personal data in the manner established by the Operational and Analytical Center under the President of the Republic of Belarus, in accordance with the classification of information resources (systems) containing personal data.

4. RIGHTS OF PERSONAL DATA SUBJECTS

4.1. A personal data subject shall have the right to:

4.1.1. at any time, without stating reasons, withdraw their consent to the processing of personal data by submitting to the Company an application in the form through which their consent was obtained;

4.1.2. obtain information relating to the processing of their personal data, including:
- confirmation of the fact of personal data processing by the Company;
- their personal data and the source of their receipt;
- the legal grounds and purposes of personal data processing;
- the period for which their consent has been given;
- other information provided for by legislation;

4.1.3. receive from the Company, free of charge, information on the provision of their personal data to third parties once per calendar year;

4.1.4. require from the Company, free of charge, termination of the processing of their personal data, including deletion thereof, where there are no grounds for the processing of personal data;

4.1.5. appeal against the actions (inaction) and decisions of the Company that violate their rights in the processing of personal data to the uthorized body for the protection of the rights of personal data subjects in accordance with the procedure established by law.

4.2. In order to exercise their rights related to the processing of personal data by the Company, the personal data subject shall submit to the Company an application to the address specified in Section 1 of this Policy, and, where exercising the right to withdraw consent, in the form in which such consent was obtained.

4.3. Such application shall contain:

– surname, given name, patronymic (if any) of the personal data subject, and the address of their place of residence (place of stay);
– date of birth of the personal data subject;
– identification number of the personal data subject, and where no such number exists, the number of the identity document of the personal data subject, where such information was provided by the personal data subject when giving consent to the Company;
– a statement of the essence of the personal data subject's requirements;
– the handwritten signature or electronic digital signature of the personal data subject.

4.4. The Company reserves the right not to consider applications from personal data subjects received by other means (telephone, etc.).

4.5. For assistance in exercising rights related to the processing of personal data by the Company, the personal data subject may also contact the person responsible for organising the processing of the Company's personal data by sending a message to: beyoung.belcrew@gmail.com.

4.6. The Company provides the personal data subject with access to their personal data, blocks unlawfully processed personal data, rectifies personal data or ensures their rectification, and performs other actions in accordance with the Law.

APPENDIX 1

to the Regulation on the Policy Regarding the Processing of Personal Data

Purposes, scope, legal grounds and periods for processing personal data by the Application

Purposes of personal data processing	Categories of personal data subjects whose data are processed	List of personal data processed	Legal grounds for personal data processing	Personal data storage period
Provision of access to the Application's functionality; marketing analytics.	Application users.	Identifiers and technical data of the user's device: an internal user identifier (userId) generated and/or stored in the Application for the operation of functions and subscription verification; advertising identifiers and related device identifiers (for example, Advertising ID on Android), if advertising SDKs are used and the system provides such identifiers. As part of providing a subscription and/or purchases, the Application may process: a product and/or subscription identifier; a purchase token and/or receipt and/or invoice (purchase token and/or purchase data and/or signature, and similar data issued by the store); the Application package identifier.	The personal data subject's consent to the processing of their personal data by the Company (Article 9 of the Law), granted by the user ticking the box "I agree with the terms of the Regulation on the Policy regarding the Processing of Personal Data" upon the first launch of the Application for the purpose of its further use.	Data are processed and stored for 3 (three) years from the last recorded instance of the user's use of the Application. Where a different, longer storage period is required by applicable legislation and/or pursuant to the terms of operation of the relevant services (for example, app stores, analytics/advertising services), such period shall apply.