

APPROVED BY

General Director

(position)



(signature)

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(full name)

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Gazprom Neft Middle East B.V.

Policy

Personal Data Processing Policy

Information on the Policy

- 1 ELABORATED by the Corporate Security Unit.
- 2 PROCESS OWNER Head of the Information Protection Directorate.
- 3 This document is elaborated in accordance with the requirements of Gazprom Neft PJSC.
- 4 VERSION 2.0 IS IMPLEMENTED FOR THE FIRST TIME

Preamble

Personal Data Processing Policy is elaborated to ensure compliance of Gazprom Neft Middle East B.V. (hereinafter referred to as the “**Company**”) with the laws and other regulations concerning personal data protection of the countries where the Company’s branches and offices are located, including the GDPR. This Policy takes into account the by-laws concerning personal data protection of Gazprom Neft PJSC.

1. SCOPE OF APPLICATION

- 1.1 The Company's Personal Data and Personal Data Processing Policy (hereinafter referred to as the "**Policy**") sets up the main principles, objectives, terms and conditions and methods of Personal Data and Personal Data processing, lists of the subjects and the Personal Data and Personal Data processed by the Company, the Company's functions in the course of Personal Data and Personal Data processing, Personal Data and Personal Data subjects' rights as well as the Company's requirements to Personal Data and Personal Data protection.
- 1.2 Provisions of the Policy shall be the basis for elaboration of the by-laws governing the issues concerning processing of Personal Data and Personal Data of the Company's employees and other Personal Data and Personal Data subjects.
- 1.3 This Policy shall be universally binding.
- 1.4 Terms and abbreviations used in the Policy are specified in Appendix 1.

2. PRINCIPLES AND OBJECTIVES OF PERSONAL DATA PROCESSING

- 2.1 As a Personal Data operator the Company processes Personal Data of its employees and other Personal Data subjects not being in employment relationship with the Company.
- 2.2 The Company processes Personal Data considering the necessity of ensuring protection of rights and freedoms of the Company's employees and other Personal Data subjects inter alia the right of privacy, personal and family secrets on the basis of the following principles:
 - 2.2.1 the Company processes Personal Data on a legal and equitable basis;
 - 2.2.2 Personal Data processing shall be limited to achievement of certain preliminary determined legal objectives;
 - 2.2.3 Personal Data processing incompatible with the objectives of Personal Data processing shall be prohibited;
 - 2.2.4 integration of the databases containing Personal Data objectives of processing of which are incompatible shall be prohibited;
 - 2.2.5 there shall be only processable the Personal Data meeting the objectives of processing thereof;
 - 2.2.6 content and scope of the processed Personal Data shall meet the declared processing objectives. Redundancy of the processed Personal Data in relation to the declared objectives of processing thereof shall be prohibited;
 - 2.2.7 in the course of Personal Data processing there shall be ensured correctness, sufficiency and, when necessary, actuality of the Personal Data in relation to the objectives of processing thereof. The Company shall take (or cause to be taken) the necessary measures aimed at deletion or clarification of incomplete or incorrect Personal Data;
 - 2.2.8 Personal Data shall be stored in the form enabling to determine the Personal Data subject for the period not exceeding the time required for achievement of processing objectives unless the period of Personal Data processing is stipulated in any federal law or an agreement party, beneficiary or guarantor to which is the Personal Data subject;

2.2.9 processable Personal Data shall be either destroyed or anonymized upon achievement of the processing objective or if there is no further need for achievement thereof unless otherwise provided by any federal law.

2.3 The Company processes Personal Data in order to:

2.3.1 ensure compliance with the applicable laws and regulations concerning Personal Data protection of the countries where the Company's branches and offices are located;

2.3.2 govern employment relations with the Company's employees (to promote employment, training and professional advancement, to ensure personal security, to control scope and quality of the works performed and to ensure safekeeping of property);

2.3.3 provide the Company's employees and their family members with additional guarantees and benefits including voluntary medical insurance, health maintenance and other types of social security services;

2.3.4 protect life, health or other vital interests of Personal Data subjects;

2.3.5 prepare, conclude, execute and terminate agreements with contractors;

2.3.6 maintain access and intrafacility modes at the Company's facilities;

2.3.7 form reference materials for internal information support of the Company's activity, activity of its subsidiaries, Gazprom Neft PJSC, its branches and representative offices as well as subsidiaries and organizations of Gazprom Neft PJSC;

2.3.8 enforce court orders, other authorities' or officials' orders subject to enforcement in accordance with the Enforcement Law;

2.3.9 exercise the Company's rights and legal interests within the framework of carrying out of the activities stipulated in Articles of Association or other by-laws of the Company or the third persons or achievement of worthwhile objectives;

2.3.10 achieve other legal objectives.

3. PRINCIPLES AND OBJECTIVES OF THE PROCESSING OF PERSONAL DATA

3.1 Anyone processing Personal Data must comply with the principles set out in the GDPR. These provide that Personal Data must be:

3.1.1 Processed fairly, lawfully and in a transparent manner.

3.1.2 Collected only for specified, explicit and legitimate purposes.

3.1.3 Adequate, relevant and limited to what is necessary in relation to the purpose for which the Personal Data is processed.

3.1.4 Accurate and where necessary kept up to date.

3.1.5 Not kept in a form which permits identification of Data Subjects for longer than necessary for the purpose for which the Personal Data is processed.

3.1.6 Made available to Data Subjects, with Data Subjects allowed to exercise certain rights in relation to their Personal Data.

3.1.7 Processed in a manner that ensures its security using appropriate technical and organisational measures to protect against unauthorised or unlawful processing and against accidental loss destruction or damage.

- 3.1.8 Not transferred to people or organisations situated in countries without adequate safeguards.
- 3.2 The Company acknowledges it will be classified as a data controller under the GDPR and will be both responsible for complying with these principles and for demonstrating its compliance.
- 4. LIST OF THE SUBJECTS WHOSE PERSONAL DATA ARE PROCESSED BY GAZPROM NEFT MIDDLE EAST B.V.**
- 4.1 The Company processes Personal Data and Personal Data of the following categories of subjects:
- 4.1.1 employees of the Company's subdivisions;
- 4.1.2 employees of subdivisions of Gazprom Neft PJSC;
- 4.1.3 other Personal Data subjects (in order to achieve the processing objectives specified in section 3 of the Policy).
- 5. LIST OF THE SUBJECTS WHOSE PERSONAL DATA ARE PROCESSED**
- 5.1 List of the Personal Data processed by the Company shall be set up in accordance with by-laws of the Company and Gazprom Neft PJSC considering the objectives of Personal Data processing specified in section 2 of the Policy and for Personal Data, those objectives also set out in section 3 of the policy.
- 6. FUNCTIONS OF GAZPROM NEFT MIDDLE EAST B.V. IN THE COURSE OF PERSONAL DATA AND PERSONAL DATA PROCESSING**
- 6.1 In the course of Personal Data and Personal Data processing the Company shall:
- 6.1.1 take the measures necessary and sufficient to meet the requirements of by-laws of the Company and Gazprom Neft PJSC concerning Personal Data;
- 6.1.2 take legal security measures, employ operational discipline and engineering controls to protect Personal Data and Personal Data against unauthorized or accidental access thereto, destruction, modification, blocking, copying, provision, distribution as well as other illegal actions with respect to Personal Data;
- 6.1.3 issue the by-laws determining policy and issues of processing and protection of Personal Data and Personal Data in the Company;
- 6.1.4 acquaint with the Company's employees directly involved in Personal Data and Personal Data processing with the Company's by-laws concerning Personal Data and Personal Data inter alia the requirements concerning Personal Data and Personal Data protection;
- 6.1.5 terminate processing and destroy Personal Data (excluding Personal Data) where provided for by laws of the Russian Federation concerning Personal Data
- 6.1.6 terminate processing and destroy Personal Data where provided for by the GDPR.
- 7. TERMS AND CONDITIONS OF PERSONAL DATA AND PERSONAL DATA PROCESSING BY GAZPROM NEFT MIDDLE EAST B.V.**
- 7.1 The Company may process Personal Data fairly, lawfully and for specified purposes which are considered a lawful purposes under the terms of the GDPR, or otherwise consent may be relied

on as a ground for processing in certain limited circumstances. Consent must be freely given by the Data Subject. Consent must be specific, informed and an unambiguous indication of an individual's wishes by which they give their agreement to the processing of their Personal Data by a statement or positive action. If consent is given in a document, which deals with other matters, then the consent must be kept separate from those other matters. Such consent should not be relied on if another lawful ground for processing applies and where such Personal Data is Sensitive Personal Data, such consent must be explicit.

- 7.2 Subject always to section 7.1 the Company may process Personal Data and Personal Data on the basis of the consent of the Personal Data and Personal Data subject to the processing of his/her Personal Data and Personal Data for the specified purpose for which the consent is granted.
- 7.3 The Company shall not either disclose to the third persons or distribute Personal Data and Personal Data of the Personal Data and Personal Data subject without the consent of such Personal Data and Personal Data subject.
- 7.4 The Company shall be entitled to assign processing of Personal Data and Personal Data to other person with the consent of the Personal Data and Personal Data subject on the basis of an agreement concluded with such person. The agreement shall include the list of actions (operations) with the Personal Data and Personal Data to be performed by the person processing Personal Data, processing objectives, obligation of such person to maintain confidentiality of the Personal Data and Personal Data and to ensure Personal Data and Personal Data security in the course of processing.
- 7.5 For the purposes of internal information support the Company may create internal reference materials which may include name, patronymic, surname, place of employment, position, year and place of birth, address, telephone number, e-mail and other Personal Data and Personal Data provided by the Data subject and in relation to Personal Data, the Data Subject with his/her written consent.
- 7.6 Access to the Personal Data and Personal Data processed by the Company shall be only granted to the persons holding the positions included into the list of the Company's positions filling of which provides for Personal Data and Personal Data processing (except for publicly available and (or) anonymized Personal Data).

8. LIST OF THE PERSONAL DATA AND PERSONAL DATA ACTIONS AND METHODS OF PROCESSING THEREOF

- 8.1 The Company shall carry out collection, recording, classification, accumulation, storage, clarification (updating, modification), extraction, using, transfer (distribution, provision, granting access), anonymization, blocking, deletion, destruction of Personal Data.
- 8.2 The Company shall process Personal Data and Personal Data by the following methods:
 - 8.2.1 non-automated Personal Data and Personal Data processing;
 - 8.2.2 automated Personal Data and Personal Data processing with or without transfer of the obtained information via information and telecommunications networks;
 - 8.2.3 combined Personal Data and Personal Data processing.

9. PERSONAL DATA SUBJECTS' RIGHTS

9.1 Data subjects shall be entitled to:

- 9.1.1 obtain complete information on their Personal Data and processed by the Company;
- 9.1.2 have access to their Personal Data and including the right to obtain copies of any entries containing their Personal Data;
- 9.1.3 request changes to, clarify, block or request the destruction and erasure of their Personal Data and if such Personal Data and are incomplete, obsolete, incorrect, illegally obtained or not required for the declares processing objective, further to which any Data Subject may unconditionally request changes to or the destruction and erasure of their Personal Data;
- 9.1.4 withdraw their consents to Personal Data and processing;
- 9.1.5 take the legally provided measures to protect their rights;

10. RIGHTS OF COMPANY'S EMPLOYEES AND OTHER DATA SUBJECTS, TO THEIR PERSONAL DATA

10.1 Personal Data must be processed by Company in line with Data Subjects' rights. Data Subjects have a right to:

- 10.1.1 **withdraw consent to processing at any time** – in the limited circumstances where employees may have provided consent to the collection, processing and transfer of employees Personal Data for a specific purpose, employees have the right to withdraw consent for that specific processing at any time. Once the Company has received notification that employees have withdrawn this consent, the Company will no longer process employees information for the purpose or purposes employees originally agreed to, unless the Company has another legitimate basis for doing so at law.
- 10.1.2 **receive certain information about the Company's processing activities** – as per Company's data privacy notices.
- 10.1.3 **request access to Personal Data** - commonly known as a "Data Subject access request". This enables employees to receive a copy of the personal information the Company holds about employees and to check that the Company is lawfully processing it. A Data Subject access request must be made in writing directly to Human Resources or the Data Protection Representative. Depending on the circumstances, a fee may be charged by the Company for provision of this information. Any company personnel who receive a written request should forward it to Human Resources or the Data Protection Representative immediately.
- 10.1.4 **object to processing of Personal Data** – where the Company are relying on a legitimate interest (or those of a third party) and there is something about employees particular situation which makes employees want to object to processing on this ground. You also have the right to object where the Company are processing employees personal information for direct marketing purposes.
- 10.1.5 **request erasure of Personal Data** – subject to the Company's rights, employees may ask the Company to erase Personal Data if it is no longer necessary in relation to the purposes for which it was collected or processed. You may also ask the Company to delete or remove employees Personal Data where employees have exercised

employees right to object to processing (as above), or where employees have withdrawn consent and there is no other legal ground for processing.

- 10.1.6 **request correction of Personal Data** – to rectify inaccurate data or to complete incomplete data the Company hold about employees.
 - 10.1.7 **request the restriction of Personal Data** – employees may ask the Company to suspend the processing of employees Personal Data if, for example, employees want the Company to establish its accuracy or the reason for processing it.
 - 10.1.8 **request data portability** – in certain limited circumstances, employees may ask the Company to obtain a copy of all Personal Data employees have provided to the Company and that it be transmitted to another data controller in a structured, commonly used electronic format.
 - 10.1.9 **request a copy of an agreement under which Personal Data is transferred outside of the EEA;**
 - 10.1.10 **object to decisions based solely on automated processing, including profiling;**
and
 - 10.1.11 **make a complaint to the Information Commissioner’s Office.**
- 10.2 Identity checks must be carried out on anyone who claims to be exercising their rights as a Data Subject. Proper authorisation must be obtained before any Personal Data is disclosed.

11. MEASURES TAKEN BY GAZPROM NEFT MIDDLE EAST B.V. TO ENSURE FULFILMENT OF THE OPERATOR’S DUTIES IN THE COURSE OF PERSONAL DATA AND PERSONAL DATAPROCESSING

- 11.1 Measures necessary and sufficient to ensure compliance with the by-laws of Gazprom Neft PJSC concerning Personal Data and Personal Data shall include:
- 11.1.1 in respect of Personal Data, full compliance with the relevant obligations of a data controller set out under the GDPR, including all principles of the GDPR, in respect of such Personal Data;
 - 11.1.2 adoption of the by-laws and other documents concerning Personal Data and Personal Data processing and protection;
 - 11.1.3 establishing and doc
 - 11.1.4 obtaining of Personal Data and Personal Data subjects’ consents to their Personal Data and Personal Data processing;
 - 11.1.5 compartmentalization of the Personal Data and Personal Data processed without automation means of other information in particular by recording thereof on separate Personal Data and Personal Data tangible media, in the special section;
 - 11.1.6 ensuring of separate storage of Personal Data and Personal Data and tangible media processed for different objectives and containing different categories of Personal Data;
 - 11.1.7 prohibiting of release of personal information via open communication channels, computer networks outside the controlled area, enterprise data network of Gazprom Neft PJSC, Unified Departmental Data-Transmission Network (UDDTN) of GAZPROM and the Internet without the use of the Company’s measures ensuring Personal Data

and Personal Data security (except for publicly available and (or) anonymized Personal Data);

11.1.8 storage of Personal Data and Personal Data tangible media in compliance with the terms and conditions ensuring Personal Data and Personal Data integrity and preventing unauthorized access thereto;

11.2 Measures ensuring Personal Data and Personal Data security in the course of processing in Personal Data and Personal Data information systems shall be set up in accordance with the Company's by-laws governing the issues of Personal Data and Personal Data security in the course of processing in the Company's Personal Data and Personal Data information systems.

12. DOCUMENT AND INFORMATION SUPPORT OF THE POLICY IMPLEMENTATION

12.1 In order to implement the Policy, the Company shall elaborate the relevant by-laws and other documents including:

12.1.1 Regulation On Personal Data and Personal Data Processing;

12.1.2 Regulation On Ensuring Personal Data and Personal Data Security in the Course of Processing in Personal Data and Personal Data Information Systems;

12.1.3 List of positions filling of which provides for Personal Data and Personal Data processing;

12.1.4 Rules of Personal Data and Personal Data Processing in the Company's subdivisions;

12.1.5 Other Company's by-laws and documents governing Personal Data and Personal Data processing.

APPENDIX 1 TERMS AND ABBREVIATIONS

For the purposes of this Policy the following terms shall have the following meanings:

Data Subject: means a living, identified or identifiable individual about whom the Company holds information, including any individual who is an EU national or resident or who otherwise has rights in relation to the use, collection, processing, transfer or storage of their information under the GDPR.

GDPR: the General Data Protection Regulation ((EU 2016/679) and all applicable implementing legislation.

Personal Data: any information relating to or identifying a Data Subject who can be identified (directly or indirectly) from that data (or from that data and other information in the Company's possession or that the Company can reasonably access). It includes Sensitive Personal Data and Pseudonymised Personal Data, and can be factual (such as a name, address or date of birth) or it can be an opinion about someone (such as contained in a performance appraisal). It does not include anonymous data or data that has had the identity of the individual permanently removed.

Sensitive Personal Data: Personal Data that includes information about a person's racial or ethnic origin, political opinions, religious or similar beliefs, physical or mental health or condition or sexual life, sexual orientation, biometric or genetic data or information relating to criminal offences and convictions.

Pseudonymised Personal Data: replacing information that directly or indirectly identifies an individual with one or more artificial identifiers or pseudonyms so that the person, to whom the data relates, cannot be identified without the use of additional information which is meant to be kept separately and secure.

"Information": data (messages, information) irrespective of data format.

"Operator": governmental authority, municipal authority, legal entity or individual independently or jointly with other persons arranging and (or) carrying our Personal Data processing, determining the purposes of Personal Data processing, scope of the Personal Data subject to processing, actions (operations) with the Personal Data.

"Personal Data Processing": any action (operation) or series of actions (operations) with the Personal Data performed with or without automation means including collection, recording, classification, accumulation, storage, clarification (updating, modification), extraction, using, transfer (distribution, provision, granting access), anonymization, blocking, deletion, destruction of the Personal Data.

"Automated Personal Data Processing": personal data processing using means of computer technology.

"Personal Data Submission": actions aimed at disclosure of the Personal Data to particular person or specific range of persons.

"Distribution of Personal Data": actions aimed at disclosure of the Personal Data to indefinite range of persons.

"Personal Data Blocking": temporary termination of Personal Data Processing (except when such processing is required for the Personal Data clarification).

"Personal Data Destruction": actions making impossible the Personal Data Recovery in the Personal Data information system and (or) aimed at destruction of tangible media containing the Personal Data.

"Personal Data Anonymization": actions making impossible attribution of the Personal Data to particular Personal Data Subject without the additional information.

"Personal Data Information System": a block of the Personal Data included into personal database ensuring processing thereof using information technology and technical means.