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Gazprom Neft Middle East B.V.

Policy

Personal Data Processing Policy

Information on the Document

- 1 DEVELOPED BY the Corporate Security Directorate of Gazprom Neft PJSC
- 2 ADAPTED BY the Information Security Department of Gazprom Neft Middle East B.V.
- 3 OWNER OF THE PROCESS: Head of the Information Security Department of Gazprom Neft Middle East B.V.
- 4 VERSION 2.0
- 5 THIS DOCUMENT CANCELS VALIDITY of Personal Data Processing Policy, version 1.0 approved on July 05, 2016 by Order No. 106-16

Introduction

Personal Data Processing Policy was developed in order to comply with the European Union legislation and the requirements of Gazprom Neft PJSC in the area of processing and ensuring the security of personal data in Gazprom Neft Middle East B.V., in accordance with Regulation (EU) as of April 27, 2016 No. 2016/679 (General Data Protection Regulation) [4] and Policy ПК-12.02.02 Personal Data Processing Policy version 2.0 of Gazprom Neft, PJSC, as well as other regulatory legal acts, and is aimed at ensuring the protection of human rights and freedoms when processing personal data.

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1 General Provisions

1.1 Personal Data Processing Policy (hereinafter referred to as the “Policy”) in the Gazprom Neft Middle East B.V. (hereinafter referred to as the “Company”) sets up the main principles, objectives, terms and conditions, and methods of personal data processing, lists of the subjects and the personal data processed by the Company, the Company’s functions in the course of personal data processing, personal data subjects’ rights as well as the Company’s requirements to personal data protection.

1.2 Provisions of the Policy shall be the basis for elaboration of the local regulatory documents governing the issues concerning processing of personal data of the Company’s employees, and other personal data subjects.

1.3 Provisions of this Policy shall enter into force since approval hereof and shall remain in force either till approval of the updated version or till cancellation hereof.

1.4 The provisions of this Policy are intended to be implemented by all divisions of the Company.

2 Terms and Abbreviations

2.1 The following local terms and abbreviations determined in KT-004, are used in this document:

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

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

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

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

Company: Gazprom Neft Middle East B.V.

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

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, and destruction of the Personal Data.

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, and actions (operations) with the Personal Data.

Personal Data: any information directly or indirectly related to particular or determined individual (personal data subject).

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.

Sensitive data: personal data related to race, ethnical identity, political opinions, religious or philosophic beliefs, health status, and intimacy.

Cross-Border Transfer of Personal Data: transfer of the Personal Data to the territory of

a foreign state, to foreign governmental authority, foreign individual, or foreign legal entity.

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.

3 Legislative and other regulatory legal acts, in accordance with which Personal Data Processing Policy in the Company is determined

3.1 Personal Data Processing Policy in the Company is determined in accordance with the following regulatory legal acts:

- General Data Protection Regulation, Rules (EU) of the European Parliament and Council of the European Union as of April 27, 2016 No. 2016/679 on protection of individuals upon personal data processing and free circulation of such data;
- Local regulations of Gazprom Neft PJSC in the area of processing, and ensuring the security of personal data;
- other regulatory legal acts, and regulatory documents of authorized regulatory bodies in countries where branches and offices of the Company are located.

4 Principles and objectives of personal data processing

4.1 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.

4.2 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:

- the Company processes personal data on a legal and equitable basis;
- personal data processing shall be limited to achievement of certain preliminary determined legal objectives;
- personal data processing incompatible with the objectives of personal data processing shall be prohibited;
- integration of the databases containing personal data objectives of processing of which are incompatible shall be prohibited;
- there shall be only processable the personal data meeting the objectives of processing thereof;
- 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;
- 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;
- 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 the applicable law or an agreement party, beneficiary or guarantor to which is the personal data subject;
- 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 applicable law.

4.3 The Company processes personal data in order to:

- ensure compliance with the General Data Protection Regulation, Regulation (EU) of the European Parliament and of the Council of the European Union as of April 27, 2016 No. 2016/679;
- implement functions, powers and duties imposed by the legislation of countries where branches and offices of the Company are located and;
- 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);
- provide the Company's employees and their family members with additional guarantees and benefits including non-state pension provision, voluntary medical insurance, health maintenance, and other types of social security services;
- protect life, health, or other vital interests of personal data subjects;
- prepare, conclude, execute, and terminate agreements with contractors;
- maintain access, and intrafacility modes at the Company's facilities;
- prepare reference materials for internal information support of the Company's activity, activity of Gazprom Neft PJSC subsidiaries, Gazprom Neft PJSC, and Gazprom PJSC, their branches and representative offices;
- perform management functions, and ensure the activities of the Company;
- implement the social, and charitable projects;
- ensure the functioning of the Company's Internet resources, including those providing services, and monitoring user behavior;
- enforce court orders, other authorities' or officials' orders subject to enforcement in accordance with the Enforcement Law;
- exercise the Company's rights and legal interests within the framework of carrying out of the activities stipulated in Articles of Association or other local regulatory documents of the Company or the third persons or achievement of worthwhile objectives;
- achieve other legal objectives.

5 List of the subjects personal data of which are processed by the Company

5.1 The Company processes personal data of the following categories of subjects:

- employees of the Company's subdivisions;
- employees of Gazprom Neft PJSC's subsidiaries;
- other personal data subjects (in order to achieve the processing objectives specified in section 3 of the Policy).

6 List of the subjects whose personal data are processed by Gazprom Neft PJSC

6.1 List of the personal data processed by the Company shall be set up in accordance with local regulatory documents of the Company and considering the objectives of personal data processing specified in section 3 of the Policy.

6.2 Processing of sensitive information related to race identity, political opinions, religious

or philosophic beliefs, and intimacy is prohibited by the Company.

7 The Company's functions in the course of personal data processing

7.1 In the course of personal data processing the Company shall:

- take the measures necessary and sufficient to meet the requirements of legislation of the countries where the branches and offices of the Company are located, and local regulatory documents of the Company and Gazprom Neft PJSC concerning personal data;
- take legal security measures, employ operational discipline and engineering controls to protect 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;
- assign a person responsible for the organization of personal data processing in the Company;
- issue the local regulatory documents determining policy and issues of processing and protection of personal data in the Company;
- acquaint with the Company's employees directly involved in personal data processing with the Company's local regulatory documents concerning personal data inter alia the requirements concerning personal data protection, and trains these employees;
- publish or otherwise provide unrestricted access to this Policy;
- duly inform personal data subjects or representatives thereof of availability of the personal data related to the relevant subjects as well as provide them with an opportunity of familiarization with such personal data in case of appeal and (or) receipt of inquiries of the said personal data subjects or representatives thereof;
- terminate processing and destroy personal data where provided for by applicable laws concerning personal data;
- perform other actions provided for by the applicable law related to personal data.

8 Terms and conditions for personal data processing in the Company

8.1 The Company shall process personal data with the consent of the personal data subject to processing of his/her personal data, unless otherwise provided by applicable legislation related to personal data.

8.2 The Company shall neither disclose to the third persons nor distribute personal data of the personal data subject without the consent of such personal data subject, unless otherwise provided by applicable legislation.

8.3 The Company shall be entitled to assign processing of personal data to other person with the consent of the 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 to be performed by the person processing personal data, processing objectives, obligation of such person to maintain confidentiality of the personal data, and to ensure personal data security in the course of processing.

8.4 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 provided by the personal data subject with his/her consent, unless otherwise provided for by the applicable laws.

8.5 Access to the 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 processing (except for publicly available and (or) anonymized personal data).

8.6 When interacting with subsidiaries of the GPN group of companies and organizations located on the territory of other states, as well as with foreign authorities, individuals and legal entities, the cross-border transfer of personal data to the territory of foreign states is carried out in accordance with the applicable law.

9 List of the personal data actions, and methods of processing thereof

9.1 The Company shall carry out collection, recording, classification, accumulation, storage, clarification (updating, modification), extraction, using, transfer (distribution, provision, granting access), anonymization, blocking, deletion, and destruction of personal data.

9.2 The Company shall process personal data by the following methods:

- non-automated personal data processing;
- automated personal data processing with or without transfer of the obtained information via information, and telecommunications networks;
- combined personal data processing.

10 Personal data subjects' rights

10.1 Personal data subjects shall be entitled to:

- full information on their personal data processed by the Company;
- have access to their personal data including the right to obtain a copy of any entry containing their personal data except to the extent stipulated by the applicable law, as well as access to the medical documents related thereto through a health care professional as may be chosen by them;
- specify their personal data, blocking or destruction thereof if personal data is incomplete, out-of-date, inaccurate, illegally obtained or not required for the declared purpose of processing;
- withdrawal of consent to personal data processing;
- take the measures aimed at protection of their personal data stipulated in the laws;
- appeal against the Company's actions or inactivity performed with violation of the requirements of the applicable laws related to personal data, to the authorized body for protection of personal data subjects' rights or to the court;
- execution of other rights provided for in the applicable laws.

11 Measures taken by the Company to ensure fulfilment of the operator's duties in the course of personal data processing

11.1 Measures necessary and sufficient for securing the Company's fulfillment of the operator's obligations, provided for by the applicable laws related to personal data include the following:

- adoption of the local regulatory documents and other documents concerning personal data processing and protection;
- organizing training and conducting methodological work with employees of the Company's divisions holding positions included in the list of positions filling of which provides for the personal data processing;
- obtaining the consent of the personal data subjects to the processing of their personal data, taking into account the requirements for the need to obtain, the form

- and content, determined by the norms of the applicable law;
- the personal data processed without automation means of other information in particular by recording thereof on separate personal data tangible media, in the special section;
 - ensuring of separate storage of personal data and tangible media processed for different objectives and containing different categories of personal data;
 - prohibiting of release of personal information via open communication channels, computer networks outside the controlled area, enterprise data network of the Company and Gazprom Neft PJSC, Unified Departmental Data-Transmission Network (UDDTN) of Gazprom JSC and the Internet without the use of the Company's measures ensuring Personal Data security (except for publicly available and (or) anonymized personal data);
 - storage of personal data tangible media in compliance with the terms and conditions ensuring personal data integrity and preventing unauthorized access thereto;
 - internal control over the compliance of personal data processing with the EU Regulations and local regulations of Gazprom Neft PJSC, the requirements for the protection of personal data in this Policy, and other local regulations of the Company;
 - other measures provided for by the applicable law and European Union law related to personal data.

11.2 Measures ensuring personal data security in the course of processing in personal data information systems shall be set up in accordance with the Company's local regulatory documents governing the issues of personal data security in the course of processing in the Company's personal data information systems.

12 Control over adherence to the law and the Company's local regulatory documents concerning personal data including the requirements to personal data protection

12.1 The organization and implementation of internal control over the adherence of the Company's divisions to the applicable law and the law of European Union, local regulations in the area of personal data, including the requirements to the personal data protection, is provided by the person responsible for organizing the personal data processing in the Company.

12.2 Internal control over the compliance of the personal data processing with applicable legislation and the EU Regulation adopted in accordance with them, the requirements for the personal data protection of this Policy, local regulations of the Company is carried out by the Corporate Protection Unit.

12.3 Personal responsibility for compliance with the requirements of applicable legislation and the European Union law, local regulations of the Company in the area of personal data, as well as for ensuring the confidentiality and security of personal data in the divisions of the Company rests with their managers.

13 Document and information support of the Policy implementation

13.1 In order to implement the Policy, the Company shall elaborate the relevant local regulatory documents, and other documents including:

- Regulation on Personal Data Processing;
- Regulation on Ensuring Personal Data Security in the Course of Processing in Personal Data Information Systems;
- List of positions filling of which provides for personal data processing;

- Rules of Personal Data Processing in the Company's subdivisions;
- Other Company's local regulatory documents, and documents governing personal data processing.