

**PJSC “RussNeft” Policy  
on Personal Data Processing and Protection**

Moscow  
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## 1. General provisions

PJSC "RussNeft" Policy on Personal Data Processing and Protection (hereinafter "Personal Data") (hereinafter "Policy") is a local regulation of PJSC "RussNeft" (hereinafter "the Company"), developed in accordance with Par. 2 Part 1 Article 18.1 of Federal Law No.152-FZ "On Personal Data" dated 27.07.2006, determining the main principles, purposes and conditions of Personal Data processing, as well as measures for Personal Data protection in the Company.

The requirements of this Policy shall be monitored by the person in charge for organizing the Personal Data processing.

This Policy was developed to implement the requirements of the Russian Federation legislation in the field of Personal Data processing and protection and is targeted at protecting the rights and freedoms of individuals and citizens when processing their Personal Data, including the protection of the rights for privacy, personal and family secrets.

The Company is entitled to update this Policy in accordance with Russian laws and regulations.

## 2. Terms and definitions

**Auto processing of Personal Data** - processing of personal data by means of computer technology.

**Protection of Personal Data** is a state of protection of personal data, which ensures its confidentiality, availability and integrity.

**Blocking of Personal Data** means temporarily stopping the processing of Personal Data (unless the processing is necessary to clarify the Personal Data).

**Personal Data Information System (PDIS)** is a set of information technologies and technical means contained in databases of personal data and ensuring its processing.

**Privacy of Personal Data** is a mandatory requirement for a person who has obtained access to Personal Data not to disclose such Personal Data to third parties without the consent of the owner.

**Unsanctioned access** – access to Personal Data, or actions with Personal Data that violate the rules for distinction of access using means provided by the PDIS.

**Personal Data carriers** – technical devices designed to record and process Personal Data as part of a computer, as well as to store and transfer the recorded Personal Data outside the computer, as well as paper Personal Data carriers.

**Personal Data processing** – any action (operation) or a set of actions (operations) carried out with or without the use of automated means with Personal Data, including collection, recording, systematization, accumulation, storage, clarification (updating, change), extraction, use, transfer (distribution, provision, access), anonymization, blocking, deletion, elimination of Personal Data.

**Processing of Personal Data** without using automation means is an action with Personal Data, such as use, clarification, distribution, elimination of Personal Data in relation to each of Personal Data Owners, carried out with the direct participation of a person.

**Person in charge for ensuring Personal Data protection** - a person responsible for

ensuring Personal Data protection, for the implementation and continuous compliance with the established protection measures and controlling the functioning of information protection tools used in the Company's PDIS.

**The person in charge for organizing processing of Personal Data** is the person who exercises internal control over the Company's and its employees' compliance with Russian Federation legislation on Personal Data, including requirements for the protection of Personal Data.

**Personal Data** is any information relating to a directly or indirectly identified or identifiable natural person (the Owner of Personal Data).

**Personal Data, allowed by the Owner for distribution:** Personal Data, access to which is granted by the owner to the general public by giving his/her consent to the processing of Personal Data, allowed by the Owner for distribution according to the procedure prescribed by the Federal Law "On Personal Data".

**Provision of Personal Data** is the act of disclosing Personal Data to a certain person or a certain circle of people.

**An employee of the Company** is a person working for the Company on the basis of an employment contract and who has access to Personal Data processing, both with and without the use of automated means of processing Personal Data.

**Personal Data Protection System (PDPS)** is a set of organizational and technical measures defined taking into account current threats to the safety of personal data and information technology used in PDIS.

**Information protection tools (IPT)** - technical, software, software and hardware designed or used to protect information.

**The subject of the Personal Data** is an individual who is directly or indirectly identified or identifiable with the Personal Data.

**Authorized Body for Protection of Personal Data Owner's Rights** - a federal executive body responsible for control and supervision over the compliance of personal data processing with the requirements of Russian legislation in the field of personal data.

Federal Law "On Personal Data" - Federal Law "On Personal Data" No. 152-FZ dd. 27.07.2006.

Other terms, the meaning of which is not defined in this Policy, shall be used in the sense given to them by the legislation of the Russian Federation and regulatory legal acts.

### **3. Principles of Personal Data Processing**

The Company's Personal Data processing shall be based on the principles of:

- legitimacy and fairness (compliance with the law and respect for the equal interests of the Data Owners, not abusing the opportunities provided by the Data Owners) of the purposes and methods of Personal Data processing;
- compliance of the purposes of Personal Data Processing with the legitimate purposes predetermined and stated in the collection of the Personal Data;
- scope and content of the processed Personal Data, and the manner and purpose for which the Personal Data are processed;
- the accuracy of the Personal Data, their sufficiency and relevance in relation to the

- purposes of processing the Personal Data;
- not to process Personal Data in excess of the purposes stated in the collection of the Personal Data;
  - not to combine databases containing personal data which are being processed for incompatible purposes;
  - storage of Personal Data in a form allowing identification of the Data Owner no longer than required by the purposes of Personal Data processing, or the period of storage of Personal Data established by the laws of the Russian Federation, the agreement concluded by the Company with the Data Owner, the consent to the processing of Personal Data (hereinafter - the period of storage of Personal Data);
  - destroying Personal Data upon attainment of the purpose of its processing, unless the retention period is prescribed by Russian law, an agreement to which the Data Owner is a party, beneficiary or guarantor.

#### **4. Objectives and legal basis of Personal Data processing**

The Company collects and processes Personal Data for the following purposes:

- to protect life, health or other important interests of Personal Data Owners;
- concluding, executing and terminating civil law contracts with individuals, legal entities, individual entrepreneurs and other persons in cases provided for by law and the Company's Articles of Association;
- organizing personnel records, ensuring compliance with laws and other regulations, concluding and fulfilling obligations under employment and civil law contracts;
- maintenance of personnel records, assistance to employees in finding employment, training and relocation within the staff schedule, use of various types of benefits, compliance with tax legislation in connection with the calculation and payment of personal income tax and unified social tax, pension legislation in the formation and presentation of personalized data on each income recipient, accounted for when calculating insurance contributions for obligatory pension insurance and security;
- organizing and carrying out practical training for students in higher and secondary vocational education programs;
- implementation of the Company's access control regime, safeguarding of property;
- disclosure of information on management bodies, maintenance of necessary corporate and shareholder documentation in accordance with Russian law;
- preparation of reference materials for the internal informational support of the Company's activity, its branches, companies within the Company's corporate structure and related legal entities;
- execution of judicial acts, acts of other bodies or officials to be executed in accordance with the legislation of the Russian Federation;
- issuing powers of attorney to representatives of organizations engaged for the implementation of projects of the Company's activities;
- performing other acts not contrary to the laws of the Russian Federation.

The grounds for Personal Data processing of the Company's Personal Data Owners include, but are not limited to:

- Civil Code of the Russian Federation;
- Tax Code of the Russian Federation;
- Labor Code of the Russian Federation;
- Federal Law No. 149-FZ “On Information, IT and Information Protection” dd. 27.07.2006
- Federal Law No. 152-FZ “On Personal Data” dd. 27.07.2006;
- Federal Act No. 27-FZ “On Individual (Personified) Accounting in the Compulsory Pension Insurance System” dd. 01.04.1996;
- Federal Law No. 223-FZ “On the Procurement of Goods, Works and Services by Certain Types of Legal Entities” dd. 18.07.2011;
- Federal Act No. 255-FZ “On Compulsory Social Insurance against Temporary Incapacity for Work and in Connection with Maternity” dd. 29.12.2006;
- Federal Law No. 402-FZ "On Accounting" dd. 06.12.2011;
- Federal Law No. 115-FZ "On Counteracting the Legalization (Laundering) of Proceeds of Crime and the Financing of Terrorism” dd. 07.08.2001;
- Decree of the Government of the Russian Federation No. 687 "On Approval of the Regulation on the Specifics of Processing Personal Data Performed without the Use of Automation Means” dd. 15.09.2008;
- Decree of the Government of the Russian Federation No. 1119 "On Approval of Requirements for Protection of Personal Data in Processing of Personal Data in Personal Data Information Systems" dd. 01.11.2012 (hereinafter referred to as the Decree of the Government of the Russian Federation No. 1119);
- Articles of Association of the Company.

The Company carries out automated processing of Personal Data and Personal Data Processes without the use of automated means by collecting, recording, systematizing, accumulating, storing, specifying (updating, changing), extracting, using, transferring (providing, providing, accessing), blocking, deleting, eliminating Personal Data.

The Company proceeds on the basis that, when interacting with the Company, the Data Owner provides accurate and reliable information about his/her Personal Data and promptly notifies the Company of any changes in his/her Personal Data.

## **5. Groups of Personal Data Owners**

The Company processes Personal Data of the following groups:

- employees;
- employment candidates;
- counterparties (natural persons, employees of the counterparties);
- interns;
- employees of the third parties (within the framework of contractual relations);

- visitors to the Company;
- members of the Board of Directors.

In accordance with the provisions of Russian Government Decree No. 1119, the Company processes the following categories of personal data without and with the use of automated means:

- other categories of personal data - personal data not categorized as: special, biometric and public personal data
- biometric categories of personal data - information that characterizes a person's physiological and biological characteristics.

A complete list of personal data and categories of Personal Data Owners is approved by the List of Personal Data Processed.

## **6. Conditions for processing of the Owner's Personal Data and their further transfer to the third parties**

The Company processes Personal Data of Data Owners in accordance with the Company's local regulations developed in accordance with the requirements of the Russian Federation laws in the field of Personal Data.

Personal data may be processed by the Company in the following cases:

- Personal Data processing is subject to the consent of the owner to the processing of their Personal Data;
- processing of personal data permitted to be distributed by the owner of personal data shall be subject to consent to processing of personal data permitted to be distributed by the owner of personal data separately from other consents of the owner of personal data for processing of his/her personal data;
- processing of personal data is necessary in connection with a person's participation in constitutional, civil, administrative, criminal proceedings, proceedings in arbitration courts; for execution of a judicial act, act of another body or official to be executed in accordance with the legislation of the Russian Federation;
- processing of Personal Data is necessary for the performance of an agreement, to which the Data owner is a party or a beneficiary or guarantor, as well as for the conclusion of an agreement at the initiative of the Data Owner;
- Personal Data are processed for statistical or other research purposes, with the exception of cases specified in Article 15 of the Federal Law "On Personal Data", subject to mandatory depersonalization of personal data;
- the processing of Personal Data obtained from public sources, placed there by the Data Owner or at his/her request;
- Processing of Personal Data Owner to publication or compulsory disclosure under federal law.

Unless otherwise stipulated by federal law, the Company may entrust another person to process Personal Data on the basis of an agreement concluded with this person, subject to the consent of the Data Owner. The person processing Personal Data on behalf of the

Company shall comply with the principles and rules of Personal Data processing stipulated by the Federal Law "On Personal Data".

The assignment to a third party shall specify the purposes of processing and a list of actions (operations) with Personal Data that may be performed by such a person, shall establish his/her obligations to ensure Confidentiality of Personal Data and Security of Personal Data during their processing, as well as requirements to protection of processed Personal Data in accordance with the Federal Law "On Personal Data".

The Company does not transfer Personal Data across borders (transfer to countries that provide adequate protection of Personal Data with the consent of the subject of the Personal Data).

The Company shall not take decisions that involve legal consequences with respect to Data Owners or otherwise affect their rights and legitimate interests based solely on the automated processing of Personal Data, unless the consent in writing of the Data Owner is available or in cases stipulated by federal laws, which also establish measures to ensure observance of the rights and legitimate interests of the Data Owner.

The company shall discontinue the processing of Personal Data in the following cases:

- if the Company or a person acting on behalf of the Company has identified any inappropriate Processing of Personal Data. The Company shall, within no more than three working days of such discovery, cease the improper Processing of Personal Data, or ensure that the improper Processing of Personal Data by a person acting on behalf of the Company ceases, and rectify the breaches. If it is not possible to eliminate the violations, the Company shall destroy the Personal Data or ensure its destruction within no more than ten working days from the date of identification of the inappropriate action with the Personal Data. The Company shall notify the subject of Personal Data or his/her representative about the elimination of violations or destruction of Personal Data, or, if an application or request was sent to a body authorized to protect the rights of Personal Data Owners, also this body;
- upon achievement of the objective of Personal Data Processing, the Company shall terminate the Processing of Personal Data or ensure its termination (if the Personal Data Processing is carried out by another person acting on behalf of the Company) and shall destroy the Personal Data or ensure its destruction (if the Personal Data Processing is carried out by another person acting on behalf of the Company) within thirty days after the objective of Personal Data Processing is achieved, unless otherwise provided by the agreement to which the Personal Data Owner is a party, beneficiary or guarantor or by any other agreement between the Company.
- where a Data Owner withdraws consent to the processing of his or her Personal Data, the Company shall terminate or ensure the termination of the processing of Personal Data (if the Processing of Personal Data is carried out by another person acting on behalf of the Company) and, in case the retention of Personal Data is no longer required for the purposes of Personal Data Processing, shall destroy the Personal Data or ensure its destruction (if the Processing of Personal Data is carried out by another person acting on behalf of the Company) within thirty days of the receipt of such withdrawal, unless otherwise provided in the agreement, to which the Company is a party.

If it is not possible to eliminate Personal Data within the period specified in this section, the Company shall block such Personal Data or ensure its blocking (if the Processing of Personal Data is carried out by another person acting on behalf of the Company) and ensure elimination of the Personal Data within a period not exceeding six months, unless otherwise provided for by the Federal Laws.

## **7. Consent to the Personal Data processing**

Obtaining and Processing of the Personal Data in cases provided for by the Federal Law “On Personal Data” is carried out by the Company with the consent of the Personal Data Owner. Consent to Personal Data Processing may be given by the Personal Data Owner or his representative in any form to confirm the fact of its receipt, unless otherwise provided by federal law. In case of obtaining consent to the Personal Data Processing from a representative of the Personal Data Owner, the representative’s authority to give consent on behalf of the Personal Data Owner is checked by the Company.

In cases specified in the Federal Law “On Personal Data”, Personal Data processing is carried out by the Company only with the written consent of the Personal Data Owner. Consent in the form of an electronic document signed with an electronic signature in accordance with Federal Law No.63-FZ “On Electronic Signature” dated 06.04.2011 is considered equivalent to a written consent on paper containing the Personal Data Owner's handwritten signature.

The written consent of the Personal Data Owner shall include:

- surname, first name, patronymic, address of the Personal Data Owner, number of the main document certifying his identity, information about the date of issue of the specified document and the issuing authority
- surname, first name, patronymic, address of the Personal Data Owner representative, number of the main document certifying his identity, information about the date of issue of the specified document and the issuing authority, details of a power of attorney or other document confirming the powers of this representative (upon receipt of consent from the representative of the Personal Data Owner)
- Company name and address
- purpose of Personal Data processing
- the list of Personal Data, which are to be processed with Personal Data Owner’s consent
- the name or surname, first name, patronymic and address of the person processing the Personal Data under instructions of the Company, if the Personal Data processing is entrusted to such a person
- a list of actions with Personal Data for which consent is given, a general description of the methods used by the Company for Personal Data processing
- the period during which the consent is valid, as well as the method of its withdrawal, unless otherwise provided for by federal law;
- signature of the Personal Data Owner.

The Personal Data Owner gives the Company consent to the Processing of Personal Data freely, at his own will and in his own interest. Consent to the Personal Data processing may be revoked by the Personal Data Owner by sending a written application to the



Company in a free form. In this case, the Company undertakes to stop processing, as well as to destroy all Personal Data available in the Company within the time limits established by the Federal Law “On Personal Data”.

Transfer of Personal Data to third parties is carried out by the Company with the agreement of the Personal Data Owner pursuant to the requirements of the legislation of the Russian Federation.

Consent to the processing of Personal Data, authorized by the Personal Data Owner for dissemination, is documented separately from the other consent of the Personal Data Owner to the processing of his Personal Data. The requirements for the content of consent to the Personal Data processing authorized by the Personal Data Owner for dissemination are set forth by the authorized body for the protection of the rights of Personal Data Owners.

## **8. Rights of Personal Data Owners**

In order to ensure respect for the Personal Data Owners’ rights set forth by law, the Company has developed and introduced the procedure for dealing with appeals and requests from Personal Data Owners, as well as the procedure for providing Personal Data Owners with information established by the RF legislation on Personal Data.

The Personal Data Owner or his legal representative has the right to receive information concerning Personal Data Processing, including information containing the following:

- confirmation of the fact of Personal Data Processing by the Company
- legal grounds and purposes of Personal Data Processing
- goals and processing methods of Personal Data, used by the Company
- name and location of the Company, information about persons (with the exception of employees of the Company) who have access to Personal Data or to whom Personal Data may be disclosed on the basis of an agreement with the Company or on the basis of a federal law
- processed Personal Data related to the relevant Personal Data Owner, the source of their obtaining, unless otherwise provided for by federal law
- terms of Personal Data processing, including the terms of their storage
- the procedure for the exercise by the Personal Data Owner of the rights provided for by the Federal Law *On Personal Data*
- information about the implemented or proposed cross-border transmitting of Personal Data
- the name or surname, first name, patronymic and address of the person processing Personal Data on behalf of the Company, if processing is or will be entrusted to such a person
- other information set out in the Federal Law “On Personal Data” or other federal laws in the field of Personal Data.

The Company provides the specified information upon request or on the basis of a corresponding written request of the Personal Data Owner or his representative, containing the number of the main identity document of the Personal Data Owner or his representative,

information about the date of issue of the specified document and the issuing authority, information confirming the participation of the Personal Data Owner in relations with the Company (contract number, date of conclusion of the contract, a conditional verbal designation and (or) other information), or information otherwise confirming the fact of Personal Data Processing by the Company, signature of the Personal Data Owner or his representative.

A Personal Data Owner has the right to require the Company to adjust its Personal Data, block or destroy them if the Personal Data is incomplete, outdated, inaccurate, illegally obtained or is not necessary for the stated purpose of Personal Data Processing, as well as to take measures stipulated by the RF legislation on the Personal Data to protect his rights.

In order to realize and protect their rights and legitimate interests in terms of ensuring the legality of Personal Data Processing and ensuring the Safety of Personal Data, the Personal Data Owners have the right to contact the Company.

If a Personal Data Owner believes that the Company processes Personal Data with violation of the requirements of the Federal Law *On Personal Data* or otherwise violates his rights and freedoms, the Personal Data Owner has the right to appeal the Company's actions or inaction to the Authorized Body for the Protection of the Rights of Personal Data Owners or to the court.

The right of a Personal Data Owner to have access to his Personal Data may be restricted in accordance with federal laws, including if the Personal Data Owner's access to his Personal Data violates the rights and legitimate interests of third parties.

## **9. Rights and responsibilities of the Company**

The Company has the right to:

- defend its interests in the judiciary
- provide Subjects' Personal Data to third parties, if that is permitted by the legislation of the Russian Federation (law enforcement, tax authorities, etc.);
- refuse to provide Personal Data in cases stipulated in the legislation of the Russian Federation;
- use the Personal Data of the Personal Data Owner without his consent, in cases stipulated in the legislation of the Russian Federation.

Responsibilities of the Company:

- to ensure Confidentiality with respect to Personal Data that have become known to the Company in the course of its activity
- in case of detection of illegal Personal Data Processing, identification of inaccurate Personal Data, when the Personal Data Owner or his representative applies, or at the request of the Personal Data Owner or his representative, block the illegally processed Personal Data related to this Personal Data Owner, or ensure their blocking (if the Personal Data processing is carried out by another person acting on behalf of the Company) from the moment of such application
- if the purpose of Personal Data processing is achieved, stop Personal Data Processing or ensure its termination (if Personal Data processing is carried out by another person acting on behalf of the Company) and delete Personal Data or ensure their delete (if Personal Data processing is carried out by another person acting on behalf of the Company).

## 10. Personal Data safety

To ensure the Safety of Personal Data, the Company takes the necessary and sufficient organizational and technical measures to protect Personal Data of Personal Data Owners from unauthorized or accidental access to them, destruction, modification, blocking, copying, distribution, as well as from other misconduct, including, inter alia:

- appointment by order of the Company of the Person in Charge for the organization of Personal Data processing and Person in Charge for ensuring the safety of Personal Data, as well as the determination of their functions and powers
- development and maintaining of the Company's internal regulatory documents regarding the Personal Data Processing and ensuring the Personal Data Safety in up-to-date state, establishing procedures aimed at identifying and preventing breach by the Company of the legislation of the Russian Federation regulating Personal Data issues, eliminating the consequences of such breach
- periodic internal control, as well as control carried out by third-party organizations (external audit) under a contract or provision of services, compliance of Personal Data Processing with the requirements of the Federal Law *On Personal Data* and regulatory legal acts adopted in accordance with it
- carrying out an assessment of the harm that Personal Data Owners might be subjected to in case of violation of the legislation on Personal Data, as well as the adequacy of the measures taken to ensure the enforcement of legislation on Personal Data to this harm
- familiarization of the Company's Employees directly engaged in the Personal Data Processing with the provisions of the legislation of the Russian Federation and internal regulatory documents of the Company regarding the Personal Data Processing and ensuring the Personal Data Safety, training of these Employees of the Company
- identification of Personal Data Safety threats during their processing in ISPD
- application of organizational and technical measures to ensure the Personal Data Safety when Processing Personal Data in ISPD, necessary to meet the requirements for the Personal Data protection, the implementation of which ensures the levels of Personal Data protection established by the Russian Federation Government Decree No. 1119
- application of the IPT that have duly passed conformity assessment procedure
- evaluation of the effectiveness of the measures taken to ensure the Personal Data Safety before ISPD`s coming into operation
- recording of Company employees admitted to Personal Data processing
- recording of material carriers of Personal Data
- detection of facts of unauthorized Personal Data access and taking measures
- restoration of personal data modified or destroyed as a result of unauthorized access to them
- establishment of rules for access to Personal Data processed in ISPD, as well as ensuring registration and recording of all actions with Personal Data in ISPD
- control over the measures taken to ensure the Personal Data Safety and the level of security of ISPD.

A range of measures envisaged in the Russian Federation Government Decree No. 1119 and Order of the FSTEC of Russia dated February 18, 2013 No. 21 *On approval of the Composition and content of organizational and technical measures to ensure the security of Personal Data Safety during their processing in personal data information systems*, to ensure the Personal Data Safety in the Company determined in the internal regulations of the Company, taking into account the results of assessing the possible harm to the Personal Data Owner, which may be caused in the event of a violation of his Personal Data Safety, the relevance of threats to the Personal Data Safety, as well as establishing the level of Personal Data security.

### **11. Control over compliance with the legislation of the Russian Federation and internal regulations of the Company on Personal Data**

Internal control over the Company's compliance with the requirements of the legislation of the Russian Federation and the Company's internal regulatory documents on Personal Data is carried out by the Person in Charge for organizing the Personal Data processing on an ongoing basis with the involvement of the Person in Charge for ensuring the Personal Data safety.

The Person in Charge for the organization of Personal Data processing, in particular, is obliged to:

- exercise internal control over compliance by the Company and the Company's Employees with the legislation of the Russian Federation on Personal Data, including the requirements for the protection of Personal Data
- bring to the attention of the Company's employees the provisions of Russian legislation on Personal Data, internal regulatory documents of the Company on the processing of Personal Data, requirements for the protection of Personal Data
- organize the reception and processing of appeals and requests of Personal Data Owners or their representatives and (or) to monitor the reception and processing of such appeals and requests.

### **12. Responsibility for the implementation of the Policy provisions**

Employees of the Company engaged in the processing of Personal Data, as well as the Person in Charge for organizing the processing of Personal Data, the Person in Charge for ensuring the security of Personal Data, bear disciplinary, civil, administrative or criminal liability in accordance with the legislation of the Russian Federation for breach of the requirements of this Policy, other internal regulations of the Company on Personal Data and Personal Data legislation of the Russian Federation.