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ОТКРЫТОЕ АКЦИОНЕРНОЕ ОБЩЕСТВО «ГАЗПРОМ НЕФТЬ»
(ОАО «ГАЗПРОМ НЕФТЬ»)

Policy

Personal Data Processing Policy

Policy Details

- 1 DEVELOPED by: Information Security Administration
- 2 PROCESS OWNER: DGD for Corporate Security
- 3 This document is developed in accordance with the Standardization Plan for 2015.
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Introduction

The Personal Data Processing Policy is developed for LLC Gazpromneft Science and Technology Centre compliance with the laws of the Russian Federation and considers the requirements of the Constitution of the Russian Federation, legislative instruments and other legal regulations of the Russian Federation concerning personal data.

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1 Scope of Application

1.1 The Personal Data Processing Policy (hereinafter - the Policy) of LLC Gazpromneft Science and Technology Centre (hereinafter - the Company) defines the main personal data processing principles, purposes, terms and methods, the lists of the subjects and the personal data processed by the Company, the functions of the Company in the personal data processing, the rights of the personal data subjects, and the Company requirements for the protection of personal data.

1.2 The provisions of the Policy form the basis for developing the local regulations that govern the processing of personal data of the Company employees and other personal data subjects.

1.3 The terms and abbreviations used in the Policy are listed in Annex 1.

2 Regulatory References

This document contains references to the following regulations of the GPN Group:

Catalog of the Company CT-004 "Terms and Abbreviations".

3 Legislative instruments and other legal regulations of the Russian Federation determining the Personal Data Processing Policy of LLC Gazpromneft Science and Technology Centre

3.1 The Personal Data Processing Policy of the Company is determined by the following legal regulations:

- Labor Code of the Russian Federation;
- Federal Law of July 27, 2006 No. 152-FZ "On Personal Data";
- Decree of the President of the Russian Federation dated March 06, 1997 No. 188 "On Approval of the List of Confidential Information";
- Decree of the Government of the Russian Federation dated September 15, 2008 No. 687 "On Approval of the Regulations on the Peculiarities of Non-Automated Personal Data Processing";
- Decree of the Government of the Russian Federation dated July 06, 2008 No. 512 "On Approval of the Requirements for the Material Carriers of Biometric Personal Data and the Technologies for Storing such Data out of the Personal Data Information Systems";
- Decree of the Government of the Russian Federation dated November 01, 2012 No. 1119 "On Approval of the Requirements for the Protection of Personal Data in their Processing by the Personal Data Information Systems";
- Order of the Federal Service for Technology and Export Control of Russia dated February 18, 2013 No. 21 "On Approval of the Composition and Content of the Organizational and Technical Measures to Ensure Security of Personal Data in their Processing by the Personal Data Information Systems";
- Order of the Federal Service for Supervision of Communications, Information Technology, and Mass Media dated September 05, 2013 No. 996 "On Approval of the Requirements and Methods for Depersonalization of Personal Data";
- Other legal regulations of the Russian Federation and regulatory documents of the authorized governmental bodies.

4 Principles and Purposes of the Personal Data Processing

4.1 The Company, being the personal data operator, shall process the personal data of

its employees and other subjects of personal data that have no employment relations with the Company.

4.2 The Company shall process personal data considering the need to ensure protection of the rights and freedoms of the Company employees and other personal data subjects, including protection of the right to privacy, personal and family secrets, based on the following principles:

- personal data shall be processed by the Company on a legitimate and fair basis;
- personal data shall be processed to the extent required to achieve specific, predefined and legitimate purposes;
- personal data shall not be processed in a way incompatible with the personal data collection purposes;
- databases with personal data shall not be integrated if the data are processed for the purposes incompatible with each other;
- only to personal data that meet the purposes of their processing shall be processed;
- content and volume of the processed personal data shall meet the stated processing purposes. Redundancy of the processed personal data in relation to the stated purposes of their processing shall not be allowed;
- when processing personal data, the accuracy of personal data, their sufficiency, and, if necessary, their relevance to the personal data processing purposes shall be ensured. The Company shall take the necessary measures, or cause the same, to remove or update incomplete or inaccurate personal data;
- personal data shall be stored in a form that allows determining the subject of personal data, no longer than required by the personal data processing purposes if the period for the personal data storage is not established by the federal law, the contract a party to which, the beneficiary or guarantor under which is the subject of personal data;
- the processed personal data shall be destroyed or depersonalized upon achieving the processing purposes or when there is no more need to achieve these purposes, unless otherwise provided by the federal law.

4.3 Personal data shall be processed by the Company in order to:

- ensure compliance with the Constitution of the Russian Federation, legislative instruments and other legal regulations of the Russian Federation, local regulations of the Company;
- implement the functions, powers and obligations imposed by the laws of the Russian Federation on the Company, including the provision of personal data to the governmental authorities, the Pension Fund of the Russian Federation, the Social Insurance Fund of the Russian Federation, the Federal Fund for Mandatory Medical Insurance, and to other governmental authorities;
- govern labor relations with the Company employees (assistance in employment, training and promotion, personal security, monitoring the quantity and quality of the work performed, ensuring the safety of property);
- provide the Company employees and members of their families with additional guarantees and compensations, including non-state pension schemes, voluntary medical insurance, medical care and other types of social security;
- protect life, health or other vital interests of the subjects of personal data;
- prepare, conclude, execute and terminate contracts with the counterparties;
- ensure access control and internal security policy at the Company's facilities;
- develop reference materials for the internal information support of the Company, Gazprom PJSC, JSC Gazprom Neft, branches and representative offices, as well as

- subsidiaries and organizations of Gazprom PJSC and JSC Gazprom Neft;
- enforce judicial acts, instruments of other bodies or officials that are subject to enforcement in accordance with the laws of the Russian Federation on enforcement proceedings;
- exercise the rights and legitimate interests of the Company as part of its activities provided for by the Articles of Association and other local regulations of the Company or third parties, or achieve any socially significant purposes;
- implement other legitimate purposes.

5 List of the subjects whose personal data are processed by LLC Gazpromneft Science and Technology Centre

The Company shall process personal data of the following categories of subjects:

- employees of the Company's divisions;
- other subjects of personal data (to ensure implementation of the processing purposes specified in section 4 of the Policy).

6 List of the personal data processed by LLC Gazpromneft Science and Technology Centre

6.1 The list of the personal data processed by the Company shall be determined in accordance with the laws of the Russian Federation and local regulations of the Company considering the purposes of the personal data processing specified in section 4 of the Policy.

6.2 The Company shall not process any special categories of personal data relating to race, nationality, political views, religious or philosophical beliefs, intimate life.

7 Functions of LLC Gazpromneft Science and Technology Centre in the personal data processing

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

- take the measures necessary and sufficient to ensure compliance with the laws of the Russian Federation and local regulations of the Company concerning personal data;
- take the legal, organizational and technical measures to protect personal data from unauthorized or accidental access to the same, destruction, modification, blocking, copying, provision, dissemination of personal data, as well as from other illegal actions regarding personal data;
- appoint the person responsible for organizing the personal data processing in the Company;
- issue the local regulations defining the Policy and the procedures for the personal data processing and protection in the Company;
- acquaint the Company employees directly involved in the personal data processing with the provisions of the laws of the Russian Federation and local regulations of the Company concerning personal data, including the requirements for the protection of personal data, and the training of such employees;
- publish this Policy or otherwise provide unrestricted access to this Policy;
- inform in the established manner the subjects of personal data or their representatives about the availability of personal data related to the relevant subjects, provide an opportunity to read these personal data on the application and (or) request of such subjects of personal data or their representatives, unless otherwise provided by the laws of the Russian Federation;
- terminate the processing and destroy personal data in the cases provided for by the

- laws of the Russian Federation concerning personal data;
- perform other actions provided for by the laws of the Russian Federation concerning personal data.

8 Terms of the personal data processing in LLC Gazpromneft Science and Technology Centre

8.1 The Company shall process personal data with the consent of the subject of personal data to the processing of its personal data, unless otherwise provided by the laws of the Russian Federation concerning personal data.

8.2 Without the consent of the personal data subject, the Company shall not disclose or disseminate personal data to third parties, unless otherwise provided by the federal law.

8.3 The Company may order processing of personal data to another person with the consent of the personal data subject, based on the contract concluded with such person. The contract shall include the list of actions (operations) with personal data that will be performed by the person processing personal data, the purposes of the processing, the obligation of such person to respect the confidentiality of personal data and to ensure the security of personal data during their processing, as well as the requirements for protection of the processed personal data in accordance with Article 19 of the Federal Law "On Personal Data".

8.4 For the purposes of internal information support, the Company may develop the internal reference materials which, with the written consent of the subject of personal data, unless otherwise provided by the laws of the Russian Federation, may include its last name, first name, middle name, place of work, position, year and place of birth, address, subscriber number, e-mail address, other personal data reported by the subject of personal data.

8.5 Access to the personal data processed by the Company shall be allowed only to the employees holding the positions on the Company's list of positions, which involve the personal data processing (except for the publicly available and (or) depersonalized personal data).

9 List of the actions with personal data and the methods of their processing

9.1 The Company shall collect, record, organize, accumulate, store, clarify (update, modify), retrieve, use, transfer (distribute, provide, access), depersonalize, block, delete and destroy personal data.

9.2 The Company shall process personal data in the following ways:

- non-automated processing of personal data;
- automated processing of personal data transferring the information received through the information and telecommunications networks or without it;
- combined processing of personal data.

10 Rights of the subjects of personal data

10.1 The subjects of personal data may:

- receive full information about their personal data processed in the Company;
- have access to their personal data, including the right to receive a copy of any record containing their personal data, except as provided for by the federal law, as well as access to the relevant medical data with the assistance of a medical specialist of their choice;

- update their personal data, block or destruct them if their personal data are incomplete, outdated, inaccurate, illegally obtained or are not necessary for the stated purpose of their processing;
- withdraw their consent to the processing of personal data;
- take legal measures to protect their rights;
- appeal against the actions or inaction of the Company in violation of the requirements of the laws of the Russian Federation concerning personal data to the authorized body for protection of the rights of the subjects of personal data or to the court;
- exercise other rights provided for by the laws of the Russian Federation.

11 Measures taken by LLC Gazpromneft Science and Technology Centre to ensure fulfillment of the operator's obligations in the processing of personal data

11.1 The measures that are necessary and sufficient to ensure the fulfillment by the Company of the operator's obligations provided for by the laws of the Russian Federation concerning personal data shall include the following:

- adopting the local regulations and other documents concerning processing and protection of personal data;
- organizing training and procedural guiding for the employees of the Company divisions holding the positions that are included in the list of the positions involving the processing of personal data;
- obtaining consent of the subjects of personal data for the processing of their personal data, except for the cases provided for by the laws of the Russian Federation;
- isolating the personal data processed without the use of automated facilities from other information, in particular by recording them on separate physical media for personal data, in special sections;
- ensuring separate storage of the personal data and their physical media that are processed for different purposes and contain different categories of personal data;
- establishing ban on the transfer of personal data through the open communication channels, computer networks outside the controlled zone, the corporate data transmission network of LLC Gazpromneft Science and Technology Centre, the Unified Departmental Data Transmission Network (UDDTN) of JSC Gazprom and the Internet networks without applying the measures established in the Company to ensure security of personal data (except for the publicly available and (or) depersonalized personal data);
- storing the physical media for personal data in compliance with the conditions ensuring safety of the personal data and excluding unauthorized access to the same;
- implementing internal control over compliance of the personal data processing with the Federal Law "On Personal Data" and the legal regulations adopted in accordance with the same, with the requirements for the protection of personal data, with this Policy, and with the local regulations of the Company;
- take other measures provided for by the laws of the Russian Federation concerning personal data.

11.2 The measures to ensure security of personal data in their processing by the personal data information systems shall be established in accordance with the Company's local regulations that govern security of personal data in their processing by the personal data information systems of the Company.

12 Control over compliance with the laws of the Russian Federation and local regulations of LLC Gazpromneft Science and Technology Centre concerning personal data, including requirements for the protection of personal data

12.1 The internal control over compliance of the Company's divisions with the laws of the Russian Federation and local regulations concerning personal data, including requirements for the protection of personal data, shall be organized and implemented by the person responsible for organizing the processing of personal data in the Company.

12.2 The internal control over compliance of the personal data processing with the Federal Law "On Personal Data" and the legal regulations adopted in accordance with the same, with the requirements for the protection of personal data, with this Policy, and with the local regulations of the Company shall be implemented by:

- 1) Information Security Administration - control of compliance with the requirements for the protection of information in terms of the personal data processing;
- 2) Heads of the independent divisions processing personal data - control of compliance with other established requirements when organizing operation of the divisions.

12.3 Personal responsibility for compliance with the requirements of the laws of the Russian Federation and local regulations of the Company concerning personal data, as well as for ensuring the confidentiality and security of personal data in the Company's divisions, shall be vested in the heads of the divisions.

13 Documents and Information Support to the Policy Implementation

To implement the provisions of the Policy, the Company shall develop the appropriate local regulations and other documents, including:

- Regulation on the personal data processing;
- Regulation on ensuring the security of personal data in their processing by the personal data information systems;
- List of the positions involving the personal data processing;
- rules for the processing of personal data in the Company's divisions;
- other local regulations and documents governing the personal data processing in the Company.

Annex 1 Terms and Definitions

The following terms and definition are used in this Policy.

Personal Data: any information related to a directly or indirectly defined or definable individual (subject of personal data).

Information: information (messages, data) regardless of the form of its presentation.

Operator: a governmental authority, municipal body, legal entity or individual that independently or jointly with other persons organizes and (or) implements the personal data processing, as well as determines the purposes of the personal data processing, the composition of the personal data subject to processing, the actions (operations) performed with personal data.

Processing of personal data: any action (operation) or a set of actions (operations) performed with personal data using the automated facilities or without using the same, including collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, transmission distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data.

Automated processing of personal data: processing of personal data using computer facilities.

Provision of personal data: actions aimed at disclosing personal data to a specific person or a certain circle of persons.

Dissemination of personal data: actions aimed at disclosing personal data to an undefined circle of persons.

Blocking of personal data: temporary suspension of the personal data processing (except for the cases when processing is necessary for the personal data updating).

Destruction of personal data: actions as a result of which it becomes impossible to restore the contents of personal data in the personal data information system, and (or) as a result of which the physical media for personal data are destroyed.

Depersonalization of personal data: actions as a result of which it becomes impossible to determine the ownership of personal data to a specific subject of personal data without the use of additional information.

Personal data information system: an aggregate of the personal data contained in the databases and the information technologies and technical means providing for their processing.