

**PERSONAL DATA PROCESSING POLICY
OF
SRDI O&G “PETON” LLC**

Foreword

1. DEVELOPED by the HR Department.
2. THE POLICY ENACTED BY Order No. 90-V01-01 dated 19 June 2018
3. This POLICY has been developed in accordance with Federal Law No. 152-FZ dated 27.07.2006 “On Personal Data” (hereinafter – Federal Law No. 152-FZ “On Personal Data”), Labour Code of the Russian Federation, other laws and regulations of the Russian Federation, and competent government authorities’ regulations in the area of personal data.
4. FIRST ISSUE.

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1 General Provisions

1.1 This Personal Data Processing Policy of Research Design Institute of Oil and Gas “Peton” LLC (hereinafter – the Policy) establishes a uniform personal data processing procedure in Scientific Research Design Institute of Oil and Gas “Peton” LLC (hereinafter – the Company, the Operator).

1.2 This Policy has been developed in accordance with Federal Law No. 152-FZ dated 27.07.2006 “On Personal Data” (hereinafter – Federal Law No. 152-FZ “On Personal Data”), Labour Code of the Russian Federation, other laws and regulations of the Russian Federation, and competent government authorities’ regulations in the area of personal data.

1.3 The Operator shall protect personal data against unauthorised access and disclosure, misuse, or loss.

1.4 The Operator may amend this Policy.

1.5 This Policy has been made available to any person concerned without any restrictions whatsoever, in particular, to Personal Data Owners and government authorities in charge of oversight in the area of personal data management.

2 Terms and Definitions

Personal Data means any information attributable to the identified or identifiable individual (personal data owner), whether directly or indirectly;

Information means any information (messages, data) regardless of their format;

Personal data processing means any action (operation) or set of actions (operations) with personal data, involving or without involving the use of automation equipment, including collection, recording, systemisation, accumulation, storage, adjustment (updating, modification), retrieval, use, transfer (dissemination, provision, access), anonymisation, blocking, deletion, and destruction of personal data;

Automated processing of personal data means processing of personal data by means of computer equipment;

Dissemination of personal data means actions intended to disclose personal data to the public at large;

Cross-border transfer of personal data means transfer of personal data to the territory of a foreign state to a foreign state authority, foreign individual, or foreign legal entity;

Provision of personal data means actions intended to disclose personal data to a particular person or range of persons;

Blocking of personal data means temporary suspension of personal data processing (except as such processing is required for personal data adjustment);

Destruction of Personal Data means actions making it impossible to recover the content of personal data in the personal data information system and/or resulting in the destruction of the physical media bearing personal data;

Anonymisation of personal data means actions that make it impossible to attribute personal data to a specific personal data owner without supplementary information;

Personal Data Operator (Operator) means federal government authority, local government authority, legal entity, or individual, who organises and/or performs, whether independently or jointly with other parties, the processing of personal data and determines the purposes of personal data processing, composition of personal data to be processed, and actions (operations) to be performed with personal data.

3 Principles of Personal Data Processing

3.1 Personal data shall be processed with the consent of the personal data owner.

3.2 In furtherance of the Policy, the Company shall develop the relevant bylaws and other

documents to govern the personal data processing procedure.

3.3 Once it acquires access to personal data, the Operator shall accord confidential treatment to personal data – it may not disclose or otherwise disseminate personal data to third parties without the consent of the personal data owner unless prescribed otherwise by the federal law.

3.4 A personal data owner is entitled to obtain information concerning the processing of his/her personal data containing the following details (without limitation):

- Confirmation of personal data processing by the Operator;
- Legal grounds and purposes of personal data processing;
- Purposes and methods of personal data processing applied by the Operator;
- Operator's name and location and information on the persons (except for Operator employees) enjoying access to the personal data or persons that the personal data may be disclosed to by virtue of a contract with the Operator or pursuant to the federal law;
- Personal data under processing attributable to the relevant personal data owner, source of such personal data, except as a different procedure for obtaining these data is prescribed by the Federal Law;
- Personal data processing period, including the storage period;
- Procedure for the personal data owner to exercise the rights provided for by the federal law;
- Information on completed or expected cross-border transfer of personal data;
- Company name or full name and address of the party processing personal data on the Operator's behalf where the processing is delegated to such party;
- Other data provided for by the Federal Law "On Personal Data" or any other federal laws.

3.5 A personal data owner may request the Operator to adjust, block, or delete his/her personal data if the personal data are incomplete, outdated, inaccurate, have been obtained illegally, or are unnecessary for the stated purpose of processing, as well as take legal action to protect his/her rights.

3.6 The Personal Data Operator may:

- Defend its interests in court;
- Provide owners' personal data to third parties whenever required so by the law (tax authorities, law-enforcement agencies, etc.);
- Refuse to provide personal data whenever prescribed so by the law;
- Use the owner's personal data without his/her consent whenever provided so by the law.

3.7 When collecting personal data, the Operator must provide the personal data owner with the information mentioned in Part 7, Article 14 of the Federal Law "On Personal Data".

3.8 When collecting personal data, in particular, online, the Operator shall record, systematise, accumulate, store, adjust (update, modify), and retrieve the Russian citizens' personal data using the databases located in the Russian Federation, except as stipulated otherwise by Clauses 2, 3, 4, 8, Part 1, Article 6 of the Federal Law "On Personal Data".

4 Purposes of Personal Data Collection

4.1 Personal data processing shall be limited to specific, predetermined, and legitimate purposes. No personal data processing incompatible with the purposes of personal data collection shall be allowed.

4.2 The purposes of personal data processing are spelled out in the legal acts governing the Operator's activities.

4.3 The list of purposes of personal data processing by the Operator includes:

- Ensuring compliance with the Constitution of the Russian Federation, other laws and regulations of the Russian Federation, and Company's bylaws;
- Exercising and discharging the functions, powers, and obligations that the Company is vested with by the Russian Federation laws, including those associated with provision of

personal data to federal government authorities, Pension Fund of the Russian Federation, Social Insurance Fund of the Russian Federation, Federal Compulsory Medical Insurance Fund, and other government agencies;

- Meeting the requirements of tax laws as they regard the assessment and payment of the personal income tax and unified social tax, completion of primary statistical documents in accordance with the labour, tax, and other federal laws;
- Building the Operator's succession pipeline;
- Regulating labour relations with Company employees (delivering training, controlling the quantity and quality of work performed, ensuring personal safety, securing property);
- Ensuring access control at the Company's facilities;
- Achieving the purpose of the Operator's actual activities as set out in the bylaws.

5 Legal Bases for Personal Data Processing

5.1 The legal bases for personal data processing are as follows:

- Constitution of the Russian Federation;
- Labour Code of the Russian Federation;
- Civil Code of the Russian Federation;
- Tax Code of the Russian Federation;
- Federal Law No. 27-FZ dated 01.04.1996 "On Individual (Personalised) Accounting in the Compulsory Pension Insurance System";
- Federal Law No. 212-FZ dated 24.07.2009 "On Insurance Payments to the Pension Fund of the Russian Federation, Social Insurance Fund of the Russian Federation, Federal Compulsory Medical Insurance Fund, and regional compulsory medical insurance funds";
- Federal Law No. 125-FZ dated 22.10.2004 "On Archiving in the Russian Federation"; Federal laws and regulations adopted pursuant thereto that govern relations associated with the Operator's activities;
- Contracts made between the Operator and personal data owner;
- Consent to personal data processing (in the instances not expressly provided for by the Russian Federation laws but falling within the scope of Operator's powers).

6 Amount and Categories of Personal Data to Be Processed, Categories of Personal Data Owners

6.1 The content and amount of the personal data under processing shall be consistent with the stated processing purposes. The personal data under processing shall not be redundant for the stated processing purposes.

6.2 The categories of owners of personal data processed by the Operator shall be as follows:

- Individuals who qualify as candidates for employment by the Company;
- Individuals who have employment and civil law relations with the Company;
- Individuals who have employment and civil law relations with the Company counterparties;
- Candidates for vacancies;
- Other personal data owners (for the sake of the processing purposes mentioned in Section 4 hereof).

6.3 Sensitive personal data concerning race or ethnicity, political views, religious or philosophical beliefs, and personal health may be processed in the following instances:

- If the personal data owner gives a written consent to the processing of his/her personal data;
- In accordance with the state social assistance laws, labour laws, and pension laws of the Russian Federation.

6.4 Biometric personal data may not be processed without the personal data owner's written consent.

7 Procedures and Requirements for Personal Data Processing

7.1 The Operator shall process personal data, i.e., perform operations with personal data, involving or without involving the use of automation equipment, including collection, recording, systemisation, accumulation, storage, adjustment (updating, modification), retrieval, use, transfer (provision, access), anonymisation, blocking, deletion, and destruction of personal data;

7.2 Personal data shall be processed in compliance with the principles and rules provided for by the Federal Law “On Personal Data”.

7.3 No personal data shall be processed other than those consistent with the processing purposes. The content and amount of the personal data under processing shall be consistent with the stated processing purposes.

7.4 Personal data shall be stored in a form that enables identification of the personal data owner within a period no longer than a period required for personal data processing purposes unless the personal data storage period is laid down in the federal law or contract involving the personal data owner as a party, beneficiary, or guarantor. The personal data under processing are subject to deletion or anonymisation upon achievement of the processing purposes or whenever achievement of such purposes is no longer required, except as prescribed otherwise by the federal law.

7.5 When storing personal data, the personal data Operator shall use the databases located in the Russian Federation as prescribed by Part 5, Article 18 of the Federal Law “On Personal Data”.

7.6 Biometric personal data may not be used and stored outside the personal data information systems without using such physical storage media and information storage technology that ensure protection of such data against unauthorised or accidental access thereto, destruction, modification, blocking, copying, provision, and dissemination thereof.

7.7 When processed without involving the use of automation equipment, personal data must be separated from any other information, in particular, by recording them on separate physical media bearing personal data (hereinafter – physical media), in dedicated sections, or on the margins of forms (official forms). When recording personal data on physical media, it is not allowed to record personal data with apparently inconsistent processing purposes on a single physical medium. When processing different categories of personal data without involving the use of automation equipment, a separate physical medium shall be used for each category of personal data.

7.8 The processing of personal data may be discontinued if the purposes of personal data processing are achieved, the validity period of the consent expires, the personal data owner withdraws the consent to the processing of his/her personal data, or it is revealed that the processing of personal data is inappropriate.

7.9 The Operator may delegate the processing of personal data to a third party subject to the Owner’s consent under a contract to be made with such third party.

The party processing personal data on the Operator’s behalf shall observe the personal data processing principles and rules stipulated by the Federal Law “On Personal Data” and regulations adopted pursuant thereto.

Besides, the Operator may transfer personal data to the agencies of inquiry and investigation and other competent authorities on the grounds provided for by the current laws of the Russian Federation.

7.10 The Operator and other parties acquiring access to personal data shall not disclose or otherwise disseminate personal data to third parties without the consent of the personal data owner unless prescribed otherwise by the federal law.

7.11 The Operator shall take measures that are necessary and sufficient to ensure the performance of the duties as stipulated by the Federal Law “On Personal Data” and by the laws and regulations adopted pursuant thereto. The Operator shall determine the composition and list of the measures independently.

7.12 When processing personal data, the Operator shall adopt the necessary legal, organisational, and technological measures or have then adopted in order to protect personal data against unauthorised or accidental access, destruction, modification, blocking, copying, provision, dissemination, and other illegitimate actions with personal data.

8 Updating, Correction, Deletion, and Destruction of Personal Data, Responses to Owners' Requests for Access to Personal Data

8.1 The Operator shall notify the personal data owner or his/her representative in the manner stipulated by Article 14 of the Federal Law "On Personal Data" on the information concerning the existence of personal data attributable to the relevant personal data owner and make these personal data available for review when contacted by the personal data owner or his/her representative or within thirty days upon receipt of the personal data owner's or his/her representative's request.

8.2 The Operator shall provide the personal data owner or his/her representative with an opportunity to review the personal data attributable to this personal data owner at no charge. Within seven business days at the latest upon provision by the personal data owner or his/her representative of the information to prove that the personal data are incomplete, inaccurate, or outdated, the Operator shall modify them as appropriate. Within seven business days at the latest upon provision by the personal data owner or his/her representative of the information to prove that the relevant personal data have been obtained illegally or are unnecessary for the stated processing purpose, the Operator shall destroy such personal data. The Operator shall notify the personal data owner or his/her representative of the modifications made and measures adopted thereby and adopt reasonable measures to notify the third parties that the personal data of this owner have been transferred to.

8.3 If it is confirmed that the personal data are inaccurate, the Operator shall use the information provided by the personal data owner or his/her representative, or by the competent authority for protection of personal data owners' rights or any other necessary documents to adjust the personal data or have them adjusted (where personal data are processed by a third party on the Operator's behalf) within seven business days upon provision of such information and unblock personal data.

8.4 The Operator shall discontinue personal data processing or have personal data processing discontinued by the party acting on the Operator's behalf:

- If the processing of personal data by the Operator or party acting on the Operator's behalf proves inappropriate – within three business days at the latest after becoming aware thereof;
- If the personal data owner withdraws the consent to the processing of his/her personal data by the Operator;
- If the purpose of personal data processing has been achieved – and destroy the personal data or have them destroyed (where personal data are processed by a third party on the Operator's behalf) within thirty days at the latest after achieving the purpose of personal data processing. If it is impossible to destroy the personal data within the period referred to above, the Operator shall block such personal data or have them blocked (where personal data are processed by a third party on the Operator's behalf) and ensure the destruction of such personal data within six months at the latest unless required otherwise by the federal laws.

9 Conclusion

9.1 In case of breaching the requirements established by the laws of the Russian Federation, bylaws, and other documents governing the personal data processing procedure, the employees and other persons gaining access to personal data shall incur disciplinary, administrative, civil, and criminal liability as provided for by the federal laws of the Russian Federation.