

LEGAL INFORMATION

Personal data processing policy

Introduction

The personal data processing policy has been developed in order to comply with the legislation of the Russian Federation in "Gazpromneft – SM" LLC and takes into account the requirements of the Russian Federation Constitution, legislative and other regulatory legal acts of the Russian Federation in the field of personal data.

1 The field of application

1.1 The personal data processing Policy (hereinafter referred to as the Policy) of Gazpromneft - SM LLC (hereinafter referred to as the Company) defines the main principles, goals, conditions and methods of personal data processing, the lists of subjects and personal data processed in the Company, functions of the Company within processing of personal data, the rights of subjects whose personal data are in question, as well as the requirements for personal data protection implemented in the Company.

1.2 The Policy provisions serve as the basis for the development of local regulations governing the processing of Company employees' personal data and other personal data subjects.

1.3 The terms and abbreviations used in the Policy are given in Appendix 1.

2 Legislative and other normative legal acts of the Russian Federation, which are used as the guidance to determine the Policy of personal data processing in the LLC "Gazpromneft – SM»

2.1 The company's personal data processing Policy is determined in accordance with the following regulatory legal acts:

Labor code of the Russian Federation;

Federal law No. 152-FZ of July 27, 2006 "On personal data»;

Decree of the President of the Russian Federation of March 06, 1997 No. 188 "On approval of the list of confidential information»;

Resolution of the Government of the Russian Federation of September 15, 2008 No. 687 " On approval of the Regulation on the peculiarities of personal data processing carried out without automation tools»;

The Russian Federation Government of the Resolution No. 512 of July 06, 2008 "On approval of the requirements for material carriers of biometric personal data and technologies for storing such data outside of personal data information systems»;

The Russian Federation Government of the Resolution No. 1119 of November 01, 2012 "On approval of the requirements for the protection of personal data when processing them in personal data information systems»;

The order of the FSTEC of Russia No. 21 as of February 18, 2013 "On approval of the composition and content of organizational and technical measures to ensure the security of personal data during their processing in personal data information systems»;

Federal Supervision Agency for IT and Communications order No. 996 as of September 05, 2013 " On approval of the requirements and methods for personal data depersonalization»;

other normative legal acts of the Russian Federation and normative documents of authorized state authorities.

3 The principles and purposes of personal data processing

3.1 The Company, as the operator of personal data, processes the personal data of its employees and the personal data of other subjects who are not in an employment relationship with the Company.

3.2 The Company processes personal data taking into account the need to protect the rights and freedoms of the Company employees and other subjects personal data, including the protection of the right to privacy, personal and family secrets, based on the following principles: the Company processes personal data on a legal and fair basis; processing of personal data is limited to achieving specific, pre- defined and legitimate goals; personal data processing that is incompatible with the purposes of personal data collection is not allowed; it is not allowed to combine data bases containing personal data that are processed for purposes incompatible with each other;

only personal data that meet the purposes of processing could be a subject to processing;

the content and volume of personal data processed corresponds to the stated purposes of processing. The redundancy of the processed personal data in relation to the stated purposes of their processing is not allowed; when processing personal data, we ensure the accuracy of personal data, their sufficiency, and, if necessary, their relevance to the purposes of personal data processing.

The Company takes the necessary measures or ensures that they are taken to delete or clarify incomplete or inaccurate personal data;

the storage of personal data is carried out in a form that allows determining the subject of personal data, no longer than the purposes of personal data processing require, unless the term of storage of personal data is established by Federal Law, an agreement to which the subject of personal data is a party, beneficiary or guarantor;

the processed personal data is destroyed or depersonalized upon achievement of the processing goals or in case of loss of the need to achieve these goals, unless otherwise provided by Federal Law.

3.3. Personal data is processed by the Company for the following purposes: ensuring compliance with the Constitution of the Russian Federation, legislative and other regulatory legal acts of the Russian Federation, and local regulations of the Company;

performing the functions, powers and duties assigned by the legislation of the Russian Federation to the Company, including providing personal data to state authorities, the Pension Fund of the Russian Federation, the Social Insurance Fund of the Russian Federation, the Federal compulsory medical insurance Fund, and other state bodies;

regulation of labor relations with employees of the Company {assistance in employment, training and promotion, personal security, control of the quantity and quality of work performed, ensuring the safety of property};

providing additional guarantees and compensations to the Company's employees and their family members, including non- state pension provision, voluntary medical insurance, medical care and other types of social security; protection of life , health or other vital interests of personal data subjects;

preparation, conclusion, execution and termination of contracts with contractors;

ensuring access and intra-facility modes at the Company 's facilities;

formation of reference materials for internal information support of LLC Gazpromneft-SM activities of its subsidiaries, branches and representative offices;

execution of judicial acts, acts of other bodies or officials subject to execution in accordance with the legislation of the Russian Federation on enforcement proceedings;

exercise the rights and legitimate interests of the Company in the framework of activities provided for by the Charter and other local regulations of the Company, or third parties, or achieve socially significant goals;

for other legitimate purposes.

4 List of subjects whose personal data is processed in the Gazpromneft-SM LLC

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

employees of the company structural divisions;

employees of subsidiaries and representative offices;

other subjects(personal data to ensure the implementation of the processing purposes specified in section 3 of the Policy).

5 List of personal data processed in Gazpromneft-SM LLC»

5.1 The list of personal data processed by the Company is determined in accordance with the legislation of the Russian Federation and local regulations of the Company, taking into account the purposes of personal data processing specified in section 3 of the Policy.

5.2 Special categories of personal data concerning race, nationality, political views, religious or philosophical beliefs, and intimate life are not processed in the Company.

6 Gazpromneft-SM LLC functions in the processing of personal data

6.1 When processing personal data the Company:

takes necessary and sufficient measures to ensure compliance with the requirements of the legislation of the Russian Federation and local regulations of the Company in the field of personal data;

takes legal, organizational and technical measures to protect personal data from unauthorized or accidental access, destruction, modification, blocking, copying, provision,

distribution of personal data, as well as from other illegal actions in relation to personal data;

appoints the person responsible for organizing the personal data processing in the Company;

issues local regulations defining the policy and issues of personal data processing and their protection in the Company;

familiarizes the Company's employees directly engaged in processing personal data with the provisions of the legislation of the Russian Federation and local regulations of the Company in the field of personal data, including requirements for personal data protection and trains these employees;

publishes on the Company's website or otherwise provides unrestricted access to this Policy;

informs the personal data subjects or their representatives in accordance with the established procedure about the availability of personal data related to the relevant subjects, provides an opportunity to get acquainted with these personal data when contacting and (or) receiving requests from the specified personal data subjects or their representatives, unless otherwise established by the legislation of the Russian Federation;

stops processing and destroys personal data in cases stipulated by the legislation of the Russian Federation in the field of personal data;

performs other actions stipulated by the legislation of the Russian Federation in the field of personal data.

7 Terms of personal data processing in Gazpromneft – SM LLC

7.1 The processing of personal data in the Company is carried out with the consent of the personal data subject to the processing of his personal data, unless otherwise provided by the legislation of the Russian Federation in the field of personal data.

7.2 The Company does not disclose or distribute personal data to third parties without the consent of the personal data subject, unless otherwise provided by Federal law.

7.3 The Company has the right to entrust the processing of personal data to another person with the consent of the personal data subject on the basis of a contract concluded with this person. The agreement must contain a list of actions (operations) with personal data that will be performed by the person processing personal data, the purpose of processing, the obligation of such person to respect the confidentiality of personal data and ensure the security of personal data during their processing, as well as requirements for the protection of personal data being processed in accordance with article 19 of the Federal law "On personal data".

7.4 For the purpose of internal information support, the Company may create internal reference materials, with the written consent of the subject of personal data, unless otherwise provided by the legislation of the Russian Federation, which may include his last name, first name, patronymic, place of work, position, year and place of birth, address, subscriber number, e-mail address, other personal data provided by the personal data subject.

7.5 Access to personal data processed by the Company is permitted