



**APPROVED**

**by the Resolution of the Management Board**

**of Rosneft Oil Company**

**on 25 December 2019**

**Minutes dd. 25 December 2019**

**№ Pr-IS-56p**

**Effective from**

**by Order of Rosneft**

**№ 890 dd. 31 December 2019**

## **POLICY OF THE COMPANY**

---

### **PERSONAL DATA PROCESSING**

**№ P2-03 P-07**

**VERSION 1 AMEND. 2**

**MOSCOW**  
**2019**

# CONTENTS

INTRODUCTORY PROVISIONS .....	3
INTENDED USE.....	3
SCOPE OF APPLICATION.....	3
VALIDITY AND AMENDMENT GUIDANCE .....	3
1. TERMS AND DEFINITIONS.....	4
2. DESIGNATIONS AND ABBREVIATIONS.....	6
3. ACTIVITIES IN THE FIELD OF PERSONAL DATA PROCESSING .....	7
3.1. PURPOSES AND PRINCIPLES OF PERSONAL DATA PROCESSING .....	7
3.2. LIST OF SUBJECTS OF PERSONAL DATA, PERSONAL DATA ON WHICH IS PROCESSED BY THE OPERATOR.....	8
3.3. LIST OF PERSONAL DATA PROCESSED BY THE OPERATOR.....	9
3.4. CONDITIONS OF PERSONAL DATA PROCESSING BY THE OPERATOR.....	9
3.5. REQUIREMENTS TO THE TERMS OF PROCESSING, STORAGE AND DESTRUCTION OF PERSONAL DATA.....	9
3.6. TRANSBOUNDARY TRANSFER OF PERSONAL DATA.....	10
3.7. WAYS OF PROCESSING PERSONAL DATA.....	10
3.8. RIGHTS AND OBLIGATIONS OF SUBJECTS OF PERSONAL DATA AND THE OPERATOR .....	11
3.9. MEASURES TAKEN BY THE OPERATOR WHEN PROCESSING PERSONAL DATA.....	12
4. REFERENCES .....	13
REFERENCE APPENDIX. TERMS OF THE CORPORATE GLOSSARY AND EXTERNAL SOURCES .....	14
REFERENCE APPENDIX. LND CHANGE REGISTRATION SHEET .....	16

The copyright for this local normative document (LND) is held by Rosneft Oil Company. The LND shall not be reproduced, copied or distributed in any form, fully or partially, without permission of Rosneft Oil Company.

# INTRODUCTORY PROVISIONS

## INTENDED USE

This Policy is a fundamental document that regulates the activity of Rosneft and Group Subsidiaries in sphere of personal data processing.

This Policy:

- was elaborated taking into account the requirements of the Constitution of the Russian Federation, laws and other regulatory legal acts of the Russian Federation in sphere of personal data processing;
- defines the purposes, conditions and methods of personal data processing, the lists of subjects of personal data and personal data processed at the Company, the Company's functions in the personal data processing, the rights of subjects of personal data, as well as requirements for the protection of personal data.

## SCOPE OF APPLICATION

This Policy is binding on:

- employees of Rosneft Oil Company's independent structural units, which are involved in the process of personal data processing;
- employees of controlled Entities of the Group registered in the Russian Federation, in respect of which the shareholder and other agreements with partner companies do not establish a special procedure for shareholders/participants to exercise their rights, including those to manage the controlled Entities of the Group involved in the process of personal data processing.

This Policy covers any personal data processing procedure organized both before and after putting this Policy into effect.

## VALIDITY AND AMENDMENT GUIDANCE

This Policy is a local normative standing document.

This Policy is approved, invalidated and amended in Rosneft by the decision of the Management Board of Rosneft and is put into effect in Rosneft by the order of Rosneft.

## 1. TERMS AND DEFINITIONS

### TERMS OF THE CORPORATE GLOSSARY

This Policy uses the terms of the Corporate Glossary: *Group Subsidiary (GS)*, *Independent structural unit (ISU)*.

### ROLES OF THE CORPORATE GLOSSARY

This Policy uses the roles of the Corporate Glossary: *Counterparty*.

### TERMS FROM EXTERNAL DOCUMENTS

This Policy uses the terms of the following external documents: *Automated processing of personal data* [cl. 4 art. 3 of the Federal Law dd. 27.07.2006 № 152-FZ “On Personal Data”], *Blocking of personal data* [cl. 7 art. 3 of the Federal Law dd. 27.07.2006 № 152-FZ “On Personal Data”], *Destruction of personal data* [cl. 8 art. 3 of the Federal Law dd. 27.07.2006 № 152-FZ “On Personal Data”], *Distribution of personal data* [cl. 5 art. 3 of the Federal Law dd. 27.07.2006 № 152-FZ “On Personal Data”], *Employee* [art. 20 of the Labor Code of the Russian Federation dd. 30.12.2001 № 197-FZ], *Information* [cl. 1 art. 2 of the Federal Law dd. 27.07.2006 № 149-FZ “On Information, Information Technology and Information Protection”], *Information system of personal data* [cl. 10 art. 3 of the Federal Law dd. 27.07.2006 № 152-FZ “On Personal Data”], *Personal data* [cl. 1 art. 3 of the Federal Law dd. 27.07.2006 № 152-FZ “On Personal Data”], *Personal data depersonalization* [cl. 9 art. 3 of the Federal Law dd. 27.07.2006 № 152-FZ “On Personal Data”], *Personal data processing* [cl. 3 art. 3 of the Federal Law dd. 27.07.2006 № 152-FZ “On Personal Data”], *Provision of personal data* [cl. 6 art. 3 of the Federal Law dd. 27.07.2006 № 152-FZ “On Personal Data”], *Transboundary transfer of personal data* [cl. 11 art. 3 of the Federal Law dd. 27.07.2006 № 152-FZ “On Personal Data”].

### TERMS USED FOR THE PURPOSES OF THIS DOCUMENT

**CONFIDENTIALITY OF PERSONAL DATA** – is a requirement mandatory for the operator or other person who has access to personal data to prevent their distribution without the consent of the subject of personal data or the presence of other legal grounds.

**MIXED PERSONAL DATA PROCESSING** – is processing of personal data, including both automated and non-automated processing of personal data.

**NON-AUTOMATED PROCESSING OF PERSONAL DATA** – is processing of personal data contained in a personal data information system or extracted from such a system, carried out with the direct participation of a person.

*Note: Processing of personal data may not be recognized as carried out with the use of automated means only on the grounds that personal data is contained in the information system of personal data or was extracted from it.*

**PERSONAL DATA SUBJECT** – is an individual who is directly or indirectly identified or defined by means of personal data.

## 2. DESIGNATIONS AND ABBREVIATIONS

**COMPANY** – is a group of legal entities of various organizational and legal forms, including Rosneft Oil Company, in respect of which Rosneft Oil Company is a senior or predominant (participating) subsidiary.

**OPERATOR** – is Rosneft Oil Company, or a Group Subsidiary, which processes personal data and determines the purposes of personal data processing, composition of personal data to be processed, actions (operations) performed with personal data.

### 3. ACTIVITIES IN THE FIELD OF PERSONAL DATA PROCESSING

#### 3.1. PURPOSES AND PRINCIPLES OF PERSONAL DATA PROCESSING

The operator processes personal data on subjects of personal data for the purposes of:

- ensuring compliance with the Constitution of the Russian Federation, legislative and other normative legal acts of the Russian Federation;
- implementation of the functions, powers and duties imposed by the legislation of the Russian Federation on the operator, including the provision of personal data to the Pension Fund of the Russian Federation, the Social Insurance Fund of the Russian Federation, the Federal Compulsory Medical Insurance Fund, as well as other state authorities;
- regulation of labor relations with the operator's employees (assistance to employees and candidates in employment, training, evaluation, control over the quantity and quality of work performed, compliance with the provisions of labor legislation of the Russian Federation and other acts containing norms of labor law);
- provision of additional guarantees and compensations, benefits, including non-state pension provision, voluntary medical insurance, medical care and other types of social security to the operator's employees and members of their families;
- to protect the life, health or other vital interests of personal data subjects;
- preparation, conclusion, execution and termination of contracts with counterparties;
- execution or conclusion of an agreement, a party to which or a beneficiary or guarantor of which is a personal data subject, including in the case where the operator exercises its right to assign rights (claims) under such an agreement;
- ensuring access and intra-objective mode at the operator's facilities;
- formation of reference materials for internal information support of activity of the operator and its branches and representative offices;
- execution of judicial acts, acts of other bodies or officials to be executed in accordance with the legislation of the Russian Federation on enforcement proceedings;
- exercising the rights and legitimate interests of the operator within the framework of the activities stipulated by the Charter and other local normative documents, or third parties, or achieving socially important goals;
- for other legitimate purposes.

The Company processes personal data on the basis of the following principles:

- the processing of personal data must be lawful and fair;
- processing of personal data must be limited to achieving specific, predetermined and legal purposes;
- that personal data processing that is incompatible with the purposes of personal data collection is forbidden;
- databases containing personal data whose processing is incompatible with each other may not be combined;

- only personal data that meets the purposes for which it is being processed may be processed;
- the content and scope of processed personal data must be consistent with the stated purposes of processing;
- processed personal data must not be redundant in relation to the stated purposes of its processing;
- when processing personal data, the accuracy of personal data, its adequacy, and, if necessary, relevance in relation to the purpose of personal data processing must be ensured;
- the operator must take the necessary measures or ensure that they are taken to remove or clarify incomplete or inaccurate data;
- storage of personal data shall be in a form that allows to identify the subject of personal data, no longer than required by the purposes of personal data processing, unless the period of storage of personal data is not established by the legislation of the Russian Federation, the contract, a party, beneficiary or guarantor under which the subject of personal data is;
- processed personal data shall be destroyed or depersonalized upon attainment of the processing objectives or when it is no longer necessary to attain those objectives, unless otherwise provided for by the laws of the Russian Federation.

### **3.2. LIST OF SUBJECTS OF PERSONAL DATA, PERSONAL DATA ON WHICH IS PROCESSED BY THE OPERATOR**

The operator processes personal data on the following categories of personal data subjects:

- of the operator's employees and their relatives;
- members of the Board of Directors of Rosneft and GS, members of the Management Board of Rosneft and GS, members of the Audit Commission of Rosneft and GS, candidates to the Board of Directors of Rosneft and GS, to the Management Board of Rosneft and GS, and to the Audit Commission of Rosneft and GS;
- persons whose information is subject to disclosure on the securities market;
- persons to be included or included in the lists of Rosneft and GS insiders or excluded from them;
- shareholders of Rosneft and participants/shareholders of GS;
- external candidates for the vacant operator position who have given their consent to the processing of personal data;
- pupils and students of educational organizations of general and vocational education;
- citizens of the Russian Federation and foreign citizens studying in educational organizations in accordance with contracts for training at the expense of the Company;
- of subjects of personal data, whose processing of personal data is connected with the execution of contracts, a party to which or a beneficiary of which is a subject of personal data;
- lawyers interacting with the operator;
- the authors of appeals to the operator;
- other subjects of personal data (to ensure the implementation of the objectives of personal data processing set out in this Policy).

### **3.3. LIST OF PERSONAL DATA PROCESSED BY THE OPERATOR**

The list of personal data processed by the Company is determined in accordance with the legislation of the Russian Federation on personal data and is specified in local regulatory documents of the operator in accordance with the purposes of processing personal data established in clause 3.1 of this Policy.

The operator does not process special categories of personal data relating to race, ethnicity, political views, religious or philosophical beliefs, or intimate life.

### **3.4. CONDITIONS OF PERSONAL DATA PROCESSING BY THE OPERATOR**

The operator processes personal data with the consent of the subject of personal data on the processing of his personal data, unless otherwise provided by the legislation of the Russian Federation in the field of personal data.

The operator shall not disclose or distribute personal data to third parties without the consent of the subject of personal data, unless otherwise provided by the laws of the Russian Federation.

The operator has the right to entrust the processing of personal data to another person with the consent of the subject of personal data on the basis of a contract concluded with the person. The contract must contain a list of actions (operations) with personal data to be performed by the person performing the processing of personal data, the purpose of processing, the obligation of the person to observe the confidentiality of personal data and ensure the security of personal data during their processing, as well as requirements for the protection of processed personal data in accordance with Russian legislation on personal data.

For internal information support, the operator may create publicly available internal reference materials, which with the consent of the subject of personal data, unless otherwise provided by the legislation of the Russian Federation, may include his/her name, first name, middle name, place of work, position, telephone number, email address, other personal data reported by the subject of personal data.

### **3.5. REQUIREMENTS TO THE TERMS OF PROCESSING, STORAGE AND DESTRUCTION OF PERSONAL DATA**

Requirements for the timing of processing personal data on subjects of personal data processed by the Company, are determined by internal documents of the Company in accordance with the requirements of the Federal Law of 27.07.2006 № 152-FZ "On Personal Data".

The timing of processing of personal data is set out in the consent to the processing of personal data of the subject of personal data.

Processing of personal data without the consent of the subject is possible only in cases prescribed by law.

Processing of personal data does not begin until the legal basis for the processing of personal data.

Processing of personal data ceases when the objectives of processing, the loss of the legal basis for processing established by the legislation of the Russian Federation, the withdrawal of consent for the processing of personal data by the subject of personal data.

At the end of the processing period, personal data is destroyed or depersonalized for statistical or other research purposes.

### **3.6. TRANSBOUNDARY TRANSFER OF PERSONAL DATA**

The operator may transfer personal data across borders.

Transboundary transfer of personal data in foreign countries that are party to the Convention for the Protection of Individuals with regard to automatic processing of personal data, as well as other foreign states, providing adequate protection of the rights of subjects of personal data is carried out in accordance with Federal Law of 27.07.2006 № 152-FZ "On Personal Data" and may be prohibited or restricted in order to protect the constitutional order of the Russian Federation, morality, health, rights and legitimate interests of citizens, national defense and state security.

Transboundary transfer of personal data to countries that do not adequately protect the rights of personal data subjects:

- if the subject of personal data consents to transboundary transfer of his/her personal data;
- to perform the contract to which the subject of personal data is a party;
- to protect the life, health, and other vital interests of the subject of personal data or other persons in the event that the consent of the subject of personal data cannot be obtained;
- in cases stipulated by international agreements of the Russian Federation, federal laws (if this is necessary to protect the foundations of the constitutional system of the Russian Federation, to ensure the defense of the country and state security, and to ensure sustainable and safe functioning of the transport complex, protect the interests of individuals, society and the state in the transport complex from acts of illegal interference).

Prior to transboundary transfer of personal data, the operator must ensure that the foreign country, in whose territory the transfer of personal data is carried out, provides adequate protection of the rights of personal data subjects.

Transboundary transfer of personal data of the subject of personal data, depending on the purposes and categories of personal data may be carried out throughout the territory of the Company, subject to the restrictions stated above.

### **3.7. WAYS OF PROCESSING PERSONAL DATA**

The operator processes personal data in the following ways:

- non-automated processing of personal data;
- automated processing of personal data;
- mixed processing of personal data.

Processing of personal data contained in the information system of personal data or extracted from such a system is considered to be carried out without the use of automation (non-automated), if such

actions with personal data as use, modification, distribution, destruction of personal data in respect of each of the subjects of personal data, carried out with the direct participation of man.

### **3.8. RIGHTS AND OBLIGATIONS OF SUBJECTS OF PERSONAL DATA AND THE OPERATOR**

The subjects of personal data, whose personal data is processed by the operator, have the right to:

- receive full information about the operator's processing of his/her personal data;
- clarification of personal data, blocking or destruction of personal data, if personal data is incomplete, outdated, inaccurate, illegally obtained or is not necessary for the stated purpose of processing;
- withdrawal of consent to the processing of personal data;
- appealing the action or inaction of the operator, carried out in violation of the requirements of the legislation of the Russian Federation in the field of personal data to the authorized body for the protection of the rights of subjects of personal data or in court;
- protection of their rights and legitimate interests, including compensation for damages and (or) compensation for moral harm in court;
- exercise of other rights stipulated by the legislation of the Russian Federation on personal data.

The operator has the right to:

- receive documents containing personal data from subjects of personal data or from representatives of the subject of personal data;
- require the subject of personal data to clarify the provided personal data in a timely manner;
- if the subject of personal data withdraws consent to process his/her personal data, the operator has the right to continue the processing of personal data without the consent of the subject of personal data on the grounds established by the legislation of the Russian Federation.

The operator is obliged to:

- process personal data on subjects in compliance with the principles and rules stipulated by the current legislation of the Russian Federation on personal data and internal documents of the operator in the field of personal data processing;
- provide the subject of personal data or his/her legal representative at his/her request information about the availability of the operator's personal data relating to the relevant subject of personal data;
- notify the subjects of personal data before processing their personal data in cases where personal data is not received from the subject of personal data;
- provide an opportunity to familiarize the subject of personal data or his/her legal representative with the personal data of the subject of personal data upon receipt of the relevant request, free of charge;
- take measures to clarify, destroy personal data on the subject of personal data in connection with his or her legal representative's application with a legitimate and justified requirements.

### **3.9. MEASURES TAKEN BY THE OPERATOR WHEN PROCESSING PERSONAL DATA**

The Company shall take the following measures necessary to ensure fulfillment of the operator's obligations under the laws of the Russian Federation on personal data, including, but not limited to:

- appointment of a person responsible for organizing the processing of personal data in the Company;
- adoption of local regulatory documents regulating the processing and protection of personal data;
- publication of this Policy on its official website, providing unrestricted access to it, as well as information on the implemented requirements for the protection of personal data that are not of a confidential nature;
- use of 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 other unlawful acts in relation to personal data;
- internal control over compliance of personal data processing with the personal data laws of the Russian Federation, personal data protection requirements, this Policy, and local regulatory documents;
- assessment of harm that may be caused to personal data subjects in case the operator violates the legislation of the Russian Federation on personal data and, based on this assessment, making a decision on the list of measures necessary to ensure the security of personal data;
- familiarization of the operator's employees directly engaged in processing personal data, with the provisions of the legislation of the Russian Federation on personal data and local regulatory documents of the operator on personal data, including the requirements for the protection of personal data, and training of these employees;
- when processing personal data carried out without the use of automated means, compliance with the requirements established by Government Decree of the Russian Federation dd. 15.09.2008 № 687 "On Approval of the Regulations on the Specific Processing of Personal Data Carried out without the Use of Automation";
- notification of the authorized body for the protection of the rights of subjects of personal data about the processing (intention to carry out the processing) of personal data in the cases established by the legislation of the Russian Federation on personal data;
- depersonalization of personal data processed in personal data information systems, as well as termination of processing and destruction of personal data in cases stipulated by the legislation of the Russian Federation on personal data;
- when processing personal data carried out in the information systems of personal data, compliance with the approved by the Decree of the Government of the Russian Federation dd. 01.11.2012 № 1119 "On Approval of Requirements for the Protection of Personal Data at their Processing in Information Systems";
- application of other measures stipulated by the legislation of the Russian Federation on personal data.

## 4. REFERENCES

1. Constitution of the Russian Federation.
2. Federal Law dd. 27.07.2006 № 152-FZ “On Personal Data”.
3. Decree of the Government of the Russian Federation dd. 15.09.2008 № 687 “On Approval of the Regulations on the Specific Processing of Personal Data Carried out without the Use of Automation”.
4. Decree of the Government of the Russian Federation dd. 01.11.2012 № 1119 “On Approval of Requirements for the Protection of Personal Data at their Processing in Information Systems”.

# REFERENCE APPENDIX. TERMS OF THE CORPORATE GLOSSARY AND EXTERNAL SOURCES

## EXTRACT FROM THE CORPORATE GLOSSARY

GROUP SUBSIDIARY (GS) – a business entity where Rosneft directly and (or) indirectly holds shares or equity stakes of 20 percent and more.

INDEPENDENT STRUCTURAL UNIT (ISU) – a structural unit directly subordinate to the Chief Executive Officer of Rosneft or the top manager of Rosneft, the top manager of the Group Subsidiary or the deputy top manager of the Group Subsidiary.

## TERMS FROM EXTERNAL DOCUMENTS<sup>1</sup>

AUTOMATED PROCESSING OF PERSONAL DATA – processing of personal data by means of computer equipment [cl. 4 art. 3 of the Federal Law dd. 27.07.2006 № 152-FZ “On Personal Data”].

BLOCKING OF PERSONAL DATA – aggregate of personal data contained in databases and information technologies and technical means enabling their processing [cl. 7 art. 3 of the Federal Law dd. 27.07.2006 № 152-FZ “On Personal Data”].

DESTRUCTION OF PERSONAL DATA – actions, as a result of which it becomes impossible to restore the content of personal data in the information system of personal data and (or) as a result of which material media containing personal data are destroyed [cl. 8 art. 3 of the Federal Law dd. 27.07.2006 № 152-FZ “On Personal Data”].

DISTRIBUTION OF PERSONAL DATA – actions aimed at disclosure of personal data to public [cl. 5 art. 3 of the Federal Law dd. 27.07.2006 № 152-FZ “On Personal Data”].

EMPLOYEE – an individual who has entered into labor relations with an employer [art. 20 of the Labor Code of the Russian Federation dd. 30.12.2001 № 197-FZ].

INFORMATION – information (messages, data) irrespective of the form of their representation [cl. 1 art. 2 of the Federal Law dd. 27.07.2006 № 149-FZ “On Information, Information Technology and Information Protection”].

INFORMATION SYSTEM OF PERSONAL DATA – aggregate of personal data contained in databases and information technologies and technical means enabling their processing [cl. 10 art. 3 of the Federal Law dd. 27.07.2006 № 152-FZ “On Personal Data”].

<sup>1</sup> External documents are understood as normative legal acts, technical regulations (of the Customs Union and the Eurasian Economic Union), national standards and standardization rules, international standards, regional standards, regional codes of practice, interstate standards, standards of foreign countries, other external documents of similar status.

**PERSONAL DATA**

- any information directly or indirectly related to an identified or identifiable natural person (“Data Subject”) [cl. 1 art. 3 of the Federal Law dd. 27.07.2006 № 152-FZ “On Personal Data”].

**PERSONAL DATA  
DEPERSONALIZATION**

- actions, as a result of which it becomes impossible to determine, without using additional information, belonging of personal data to a particular subject of personal data [cl. 9 art. 3 of the Federal Law dd. 27.07.2006 № 152-FZ “On Personal Data”]

**PERSONAL DATA  
PROCESSING**

- any action (operation) or set of actions (operations) performed with personal data with or without the use of automation means, including collection, recording, systematization, accumulation, storage, adjustment (update, change), extraction, use, transfer (distribution, provision, access), anonymization, blocking, deletion, destruction of personal data [cl. 3 art. 3 of the Federal Law dd. 27.07.2006 № 152-FZ “On Personal Data”].

**PROVISION OF PERSONAL  
DATA**

- actions aimed at disclosure of personal data to a certain person or a certain group of persons [cl. 6 art. 3 of the Federal Law dd. 27.07.2006 № 152-FZ “On Personal Data”].

**TRANSBOUNDARY  
TRANSFER OF PERSONAL  
DATA**

- transfer of personal data to the territory of a foreign state to a foreign government authority, a foreign individual or a foreign legal entity [cl. 11 art. 3 of the Federal Law dd. 27.07.2006 № 152-FZ “On Personal Data”].

## REFERENCE APPENDIX. LND CHANGE REGISTRATION SHEET

VERSION/ AMENDMENT	DATE AND DETAILS OF ROSNEFT OIL COMPANY ADMINISTRATIVE DOCUMENTS			BRIEF ANNOTATION
	APPROVAL	ENACTMENT (BRINGING INTO EFFECT)	LOSS OF EFFECT	
1.00	25.12.2019 minutes of the Rosneft Management Board Meeting dated 25.12.2019 № Pr-IS-56p	01.01.2020 order dated 31.12.2019 № 890	24.12.2021	—
Amend. 1	16.12.2021 minutes of the Rosneft Management Board Meeting dated 16.12.2021 № Pr-IS-66p	24.12.2021 order dated 24.12.2021 № 747	04.10.2023	—
Amend. 2	21.07.2023 minutes of the Rosneft Management Board Meeting dated 21.07.2023 № Pr-IS-11p	04.10.2023 order dated 04.10.2023 № 00395-23		A technical update was carried out: 1) eliminated position “Financial director” was deleted in the term “Top-manager”; 2) “Terms and Definitions” section was updated with due account for changes in the Corporate Glossary; 3) the document layout was brought in compliance with the requirements of the Methodology guidelines of the Company № P3-12.02 M-0001 “Preparation of Local Normative Documents” version 2