

PERSONAL DATA POLICY

Introduction

The policy of personal data processing has been drafted in Gazprom Neft Shelf LLC Company to observe the Russian legislation and requirements of the Constitution, other legislative and normative acts of the Russian Federation in the sphere of personal information.

Application

1.1 Personal data processing policy (hereinafter referred to as the Policy) in Gazprom Neft Shelf LLC (hereinafter referred to as the Company) determines the main principles, aims, conditions and methods of personal data processing and lists the holders of personal data processed by the Company, its functions in personal data processing, the rights of personal data holders, as well as Company requirements for personal data protection.

1.2 Policy provisions comprise the basis for drafting local normative acts that regulate processing of Company personnel and other holders' data.

1.3 Policy definitions and abbreviations are listed in Appendix 1.

Legislative and other normative legal acts of the Russian Federation which determine personal data processing Policy in Gazprom Neft Shelf LLC

2.1 The personal data processing policy in the Company is determined by the following normative legal acts:

- * Labor Code of the Russian Federation;
- * Federal Law No. 152-FZ of July 27, 2006 On personal data;
- * Decree of the Russian president No. 188 of March 6, 1997 On approving the List of confidential data;
- * Resolution of the Russian government No. 687 of September 15, 2008 On approving the provisions on specifics of personal data processing without the use of automatic means;
- * Resolution of the Russian government No. 512 of July 6, 2008 On approving the requirements to material carriers of biometric personal data and storage technologies for such data outside personal data information systems;
- * Resolution of the Russian government No. 1119 of November 1, 2012 On approving the requirements to personal data protection during processing in personal data information systems;
- * Russian FSTEC order No. 21 of February 18, 2013 On approving the composition and contents of organizational and technical means to ensure personal data security during processing in personal data information systems;
- * Roskomnadzor order No. 996 of September 5, 2013 On approving the requirements and methods for depersonalizing personal data;
- * Other normative legal acts of the Russian Federation and normative acts of authorized state agencies.

Principles and aims of personal data processing

3.1 As a personal data operator, the Company processes private records of employees and other holders of personal data who have no work arrangements with the Company.

3.2 Personal data are processed by the Company to ensure protection of the rights and freedoms of the workforce and other holders of personal data, including the right for personal and family privacy on the basis of the following principles:

- Personal data are processed by the Company on a legal and fair basis;
- Personal data processing is limited by predetermined specific lawful aims;
- Personal data processing incompatible with data collection aims is prohibited;
- Unification of personal databases is prohibited if data processing aims are incompatible between them;
- Only personal data which meet processing aims shall be processed;
- The contents and volume of processed personal data shall correspond to the declared aims. Excessive than declared data collection is not allowed;
- Personal data processing shall ensure accuracy and sufficiency and, if necessary, actuality regarding the aims of processing. The Company takes the necessary measures or ensures their adoption to delete or specify incomplete or inaccurate personal data;
- Personal data are kept in a form which allows identifying the holder of personal data not longer than it is required by the personal data processing aims if the storage time is not stipulated by a federal law or an agreement to which the holder of personal data is a beneficiary or underwriter;
- Processed personal data are destroyed or depersonalized when the processing aims are reached or when it becomes no longer necessary to achieve the aims if it is not stipulated otherwise by a federal law.

3.3 The Company processes personal data with the following aims:

- To observe the Constitution of the Russian Federation, legislative and other normative legal acts of the Russian Federation, and local normative acts of the Company;
- To fulfill functions, competences and commitments of the Company under the Russian legislation, including the submission of personal data to state agencies, the Pension Fund of the Russian Federation, the Social Insurance Fund of the Russian Federation, the Obligatory Medical Insurance Fund of the Russian Federation and other state bodies;
- To regulate labor relations with Company employees (facilitate employment, training and career promotion, personal safety, amount and quality of fulfilled work, property safety);
- To provide to Company employees and their family members additional guarantees and compensations, including non-government pension provision, voluntary medical insurance, medical services and other social benefits;
- To protect life, health and other vitally important interests of personal data holders;
- To draft, sign, implement and terminate agreements with counterparts;
- To ensure access and inter-facility regime at Company facilities;
- To form reference materials for internal information provision of Company activities, subsidiaries of Gazprom Neft PJSC and Gazprom PJSC, its affiliates and representative offices, as well as Gazprom subsidiaries and organizations;
- To enforce court rulings and decisions of other agencies and officials that have to be fulfilled according to Russian legislation on enforcement proceedings;
- To promote the rights and legal interests of the Company in its activities stipulated by the Charter and other local normative acts of the Company or third parties or in order to achieve socially significant aims;
- For other legal aims.

List of personal data holders processed by Gazprom Neft Shelf LLC

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

- Company employees;
- Other personal data holders (to ensure implementation of processing aims stipulated in section 3 of the Policy).

List of personal data processed by Gazprom Neft Shelf LLC

5.1 The list of personal data processed by the Company is determined according to the Russian legislation and local normative acts of the Company with account of the personal data processing aims listed in section 3 of the Policy.

5.2 The Company does not process special personal data related to race, ethnicity, political views, religious or philosophical beliefs, and intimacy.

Gazprom Neft Shelf LLC commitments in personal data processing

6.1 In processing personal data the Company shall:

- Take sufficient and necessary measures to comply with Russian legislative requirements and local normative acts of the Company in the sphere of personal data;
- Take legal, organizational and technical measures to protect personal data from unlawful or accidental access, destruction, changes, blocking, copying, submission and distribution, as well as from other unlawful actions related to personal data;
- Appoint an official in charge of personal data processing in the Company;
- Issue local normative acts to determine the policy of processing and protecting personal data in the Company;
- Inform Company employees directly engaged in personal data processing about personal data provisions of the Russian legislation and local normative acts of the Company, including requirements to personal data protection, and train the mentioned employees;
- Publish or in other way provide unlimited access to the given Policy;
- Report in an established manner to personal data holders or their representatives the information on available personal data related to the corresponding holders, provide a possibility to acquaint them with the personal data in case of request or applications from the mentioned personal data holders or their representatives if the Russian legislation does not stipulate otherwise;
- Terminate the processing and destroy personal data in cases stipulated by Russian legislation related to personal data;
- Take other steps stipulated by Russian legislation in the sphere of personal data.

Terms and conditions for personal data processing in Gazprom Neft Shelf LLC

7.1 The Company processes personal data upon agreement of the data holder to have his or her personal data processed if the Russian legislation on personal data does not stipulate it otherwise.

7.2 Without consent of the personal data holder the Company shall not divulge the data to third parties and shall not distribute them if the federal law does not stipulate it otherwise.

7.3 The Company can entrust personal data processing to another party upon consent of the holder fixed in an agreement with him. The agreement shall list operations with personal data to be accomplished by the official in charge of personal data processing, the processing aims, the obligations of the official to protect confidentiality of personal data and ensure their security

during processing, as well as requirements to the protection of processed personal data in compliance with Article 19 of the Federal law On personal data.

7.4 To ensure internal information provision the Company can create internal reference materials which, upon written consent of the personal data holder and if Russian legislation does not stipulate it otherwise, can contain the first and last names, the patronymic, place of employment, position, date and year of birth, address, telephone number, email address and other personal data reported by their holder.

7.5 The Company shall provide access to personal data only to employees included into the list of Company positions which allow personal data processing (except for generally accessible and/or depersonalized data).

List of operations with personal data and processing methods

8.1 The Company collects, records, systemizes, accumulates, stores, specifies (updates, changes), extracts, uses, transfers (distributes, submits, provides access), depersonalizes, blocks, deletes and destroys personal data.

8.2 The Company processes personal data in the following ways:

- Non-automated personal data processing;
- Automated personal data processing with the transmission of obtained information by telecom networks or without it.
- Combined personal data processing.

Rights of personal data holders

9.1 Personal data holders are entitled to:

- Full information about their personal data processed by the Company;
- Access to their personal data, including the right to obtain copies of any record containing personal data, except for cases stipulated by a federal law, as well as access to related medical data with the help of a medical expert of their choice;
- Specify their personal data, block them or destroy in cases when personal data are incomplete, outdated, inexact or illegally obtained or unnecessary for the declared processing aims;
- Recall consent to personal data processing;
- Take law envisaged measures to protect their rights;
- Appeal actions or inaction of the Company which violate Russian legislative requirements related to personal data in an authorized agency for the protection of personal data or in court;
- Execute other rights stipulated by Russian legislation.

Gazprom Neft Shelf measures to fulfill commitments of personal data operator

10.1 The necessary and sufficient measures for the Company to fulfill its commitments of a personal data operator stipulated by Russian legislation comprise:

- Adoption of local normative acts and other documents in the sphere of personal data processing and protection;
- Training and methodological work with Company employees occupying the positions listed as authorized for personal data processing;
- Obtaining consent of personal data holders for processing their data except for cases stipulated by the Russian legislation;

- Separation of personal data processed without automatic means and other information also by keeping it on separate carriers in special sections;
- Separate storage of personal data and their carriers which are processed for various purposes and which contain various personal data;
- Prohibition of personal data transmission by open communication channels, computer networks outside the controlled zone, corporate data transmission network of Gazprom Neft Shelf and Internet without resorting to Company-established security measures for personal data (except for generally accessible and/or depersonalized data).
- Storage of personal data carriers in conditions which rule out unsanctioned access to them;
- Internal control of the compliance of personal data processing with the Federal law On personal data and related normative legal acts, requirements to personal data protection, the given Policy, local normative acts of the Company;
- Other measures stipulated by Russian legislation in the sphere of personal data.

10.2 Measures to ensure security of personal data processed in information systems are established according to local normative acts of the Company which regulate security of personal data processed in information systems of the Company.

Control over compliance with Russian legislation and Gazprom Neft Shelf LLC local normative acts in the sphere of personal data and requirements for their protection

11.1 Internal control over compliance of Company units with Russian legislation and local normative acts in the sphere of personal data, including requirements for the protection of personal data is executed by the officer in charge of personal data processing in the Company.

11.2 Internal control of personal data processing compliance with the Federal law On personal data and related normative acts and requirements to personal data protection, the given Policy and local normative acts of the Company is executed by the Corporate safeguard department.

11.3 Personal responsibility for compliance with the requirements of Russian legislation and local normative acts of the Company in the sphere of personal data and for ensuring confidentiality and security of personal data in Company units shall be borne by their top managers.

Documents and information provision of the Policy

To implement Policy provisions the Company drafts corresponding local normative acts and other documents, including:

- Personal data processing provisions;
- Provisions for personal data security during processing in personal data information systems;
- List of positions authorized to process personal data;
- Regulations for personal data processing in Company units;
- Other local normative acts and documents regulating personal data processing in the Company.

APPENDIX 1

Terms and definitions

The given Policy uses the following terms and definitions:

Personal data: *any information directly or indirectly related to a specific and identifiable individual (personal data holder).*

Information: *data (reports, records) regardless of the form of submission.*

Operator: *government agency, municipal agency, legal entity or private individual who independently or jointly with others organize and/or engage in personal data processing, as well as determine personal data processing aims, the composition of personal data liable for processing, and operations with personal data.*

Personal data processing: *any action (operation) or a cumulative action with or without the use of automated means to process personal data, including their collection, recording, systematization, accumulation, storage, specification (update, changes), extraction, use, transfer (distribution, submission, access), depersonalization, blocking, deleting and destruction of personal data.*

Automated personal data processing: *computerized data processing.*

Personal data submission: *actions aimed at divulging personal data to a specific official or a specific circle of officials.*

Personal data distribution: *actions aimed at divulging personal data to an unspecified group of people.*

Personal data blocking: *suspension of personal data processing (except for cases when processing is necessary to specify personal data).*

Personal data destruction: *actions which make it impossible to restore personal data in the information system of personal data and/or which destroy the carriers of personal data.*

Personal data depersonalization: *actions which make it impossible to identify a specific personal data holder without additional information.*

Personal data information system: *an array of personal data from databases and technological and technical means to process them.*