



**APPROVED BY:**  
**Rosneft Order**  
**dated 27 December 2016 № 815**  
**Effective as of 27 December 2016**

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# **ROSNEFT REGULATION**

## **ON PERSONAL DATA MANAGEMENT**

**№ P2-03 R-0415 UL-001**

**VERSION 1.00**

(with amendments introduced by Rosneft' Order dated 28.02.2017 № 108)

**MOSCOW**  
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# INTRODUCTORY PROVISIONS

## PURPOSE

The present Regulation sets forth standard procedure of Rosneft processing of individuals' personal data, types of personal data being processed in Rosneft, rights and obligations of individuals in the course of processing of their personal data, general requirements to protection of personal data, as well as determines the rights, obligations and responsibility of Rosneft employees, granted with access to personal data, for failure to observe requirements and standards regulating processing and protection of personal data.

The Regulation was drafted in accordance with requirements of:

- The Constitution of the Russian Federation;
- Labor Code of the Russian Federation dated 30.12.2001 № 197-FZ;
- Federal Law dated 27.07.2006 № 149-FZ "On information, information technologies and information protection";
- Federal Law dated 27.07.2006 № 152-FZ "On personal data";
- Federal Law dated 28.03.1998 № 53-FZ "On military duty and military service";
- Federal Law dated 26.02.1997 № 31-FZ "On mobilization preparedness and mobilization in the Russian Federation";
- The RF President's Decree dated 06.03.1997 № 188 "On approval of the List of confidential information";
- Resolution of the RF Government dated 15.09.2008 № 687 "On approval of the Regulation on particulars of non-automated personal data processing";
- Resolution of the RF Government dated 01.11.2012 № 1119 "On approval of requirements to protection of personal data in the course of its processing in personal data IT systems";
- Rosneft Regulation "On insider information" № P3-01.04 R-0014 UL-001,

defining the activities of Rosneft as the operator for the purpose of processing of personal data and defining the objectives of personal data processing, composition of personal data to be processed and other activities (operations) performed in relation to personal data.

## SCOPE

The present Regulation shall be binding on all employees of Rosneft engaged in personal data processing.

Administrative, local regulatory and other internal documents shall not be in conflict with this Regulation.

## VALIDITY AND AMENDMENT PROCEDURE

The present Regulation represents permanent local regulatory document.

The present Regulation shall be approved, put into force and may be recognized as ceased to be in force on the basis of Rosneft Order.

Introduction of amendments to the present Regulation may be initiated by Rosneft HR Department as well as other structural subdivisions of Rosneft after their validation with Rosneft HR Department.

Amendments to this Regulation may be introduced in case of changes in applicable legislation of the Russian Federation in the field of personal data processing, alteration of organizational structure or authorities of Rosneft Top Managers etc.

# 1. TERMS AND DEFINITIONS

## TERMS AND DEFINITIONS FROM THE CORPORATE GLOSSARY

**BLOCKING OF PERSONAL DATA** – temporary termination of personal data processing (except for cases, where processing is required for verification of personal data).

**DOCUMENTED INFORMATION** – information recorded on a material medium / media by way of documenting of information with particulars and details, which enable defining such information or its material medium in cases foreseen by applicable laws of the Russian Federation [Federal Law dated 27.07.2006 № 149-FZ “On information, information technologies and information protection”];

**INFORMATION** – information (communications, data) regardless of the form of its presentation [Federal Law dated 27.07.2006 № 149-FZ “On information, information technologies and information protection”];

**PERSONAL DATA INFORMATION SYSTEM** – a combination of personal data contained in databases, information technologies and hardware facilities applied for their processing [Federal Law dated 27.07.2006 № 152-FZ “On personal data”].

**USE OF PERSONAL DATA** – activities (operations) with the use of personal data performed by Rosneft employees for the purpose of decision making or other activities, which trigger legal consequences in relation to individuals or otherwise affecting their rights and freedoms or rights and freedoms of other persons.

**CONTRACTOR** - any Russian or foreign legal entity or physical person, with which/whom Rosneft or its Group Entity enters into contractual relationship, except for employer-employee relations.

**CONFIDENTIALITY OF PERSONAL DATA** – mandatory requirements binding on the Operator or other person, who obtains access to personal data, preventing its disclosure without prior consent of the individual or on other legitimate grounds.

**NON-RESIDENT** - physical person, who is not the RF resident [Tax Code of the Russian Federation (Part Two) dated 05.08.2000 № 117-FZ].

**DEPERSONALIZATION OF PERSONAL DATA** - activities, which result in impracticability of defining the association of personal data with relevant individual without the use of additional information [Federal Law dated 27.07.2006 № 152-FZ “On personal data”].

**PROCESSING OF PERSONAL DATA** – any activity (operation) or a combination of activities (operations) with personal data performed with the use of automation equipment or without such equipment, including collection, recording, systemization, accumulation, storing, rectification (updating, alteration), retrieval, use, transfer (disclosure, provision, access), depersonalization, blocking, deletion and destruction of personal data [Federal Law dated 27.07.2006 № 152-FZ “On personal data”].

**PUBLICLY AVAILABLE SOURCES OF PERSONAL DATA** – sources, access to which is granted to general public (books of reference on any media, including Internet, databases of state and municipal authorities, digests, encyclopedias etc.).

**TRANSFER OF PERSONAL DATA** – activities aimed at transfer of individuals’ personal data to third parties.

**PERSONAL DATA** – any information related directly or indirectly to certain or identifiable physical person (individual) [Federal Law dated 27.07.2006 № 152-FZ “On personal data”].

**PROVISION OF PERSONAL DATA** – activities aimed at disclosure of personal data to certain person or group of certain persons [Federal Law dated 27.07.2006 № 152-FZ “On personal data”].

**EMPLOYEE** – physical person, who has entered into employer-employee relationship [Article 20 of the RF LC].

**DISCLOSURE OF PERSONAL DATA** – activities aimed at disclosure of personal data to the public at large [Federal Law dated 27.07.2006 № 152-FZ “On personal data”].

**CONFIDENTIALITY REGIME** - legal, organizational, technical and other measures taken by the Company aimed at protection of confidential information and trade secrets of the Company, information with “Restricted Circulation”, personal data and insider information.

**RESIDENT** - physical person actually residing in the Russian Federation at least 183 calendar days during 12 consecutive months [Tax Code of the Russian Federation (Part Two) dated 05.08.2000 № 117-FZ].

**INDIVIDUAL** – physical person, who is directly or indirectly identified or identifiable with the use of personal data.

**TRANS-BORDER TRANSFER OF PERSONAL DATA** – transfer of personal data to the territory of a foreign country to state authorities of a foreign country, foreign physical person or foreign legal entity [Federal Law dated 27.07.2006 № 152-FZ “On personal data”].

**DESTRUCTION OF PERSONAL DATA** – activities, which result in impracticability of restoring content of personal data in information system (or) which result in destruction of material medium / media of personal data [Federal Law dated 27.07.2006 № 152-FZ “On personal data”].

## **TERMS AND DEFINITIONS FOR THE PURPOSE OF THIS REGULATION**

**AUTHORIZED REPRESENTATIVE OF ROSNEFT** - Top Manager, appointed by administrative order of Rosneft, responsible for organization of personal data processing in Rosneft.

## 2. DESIGNATIONS AND ABBREVIATIONS

**COMPANY** – group of legal entities with various organizational-legal forms, including Rosneft Oil Company, in relation to which the latter acts as the major or prevailing shareholder (participant);

**GROUP ENTITY (GE)** – legal entity, in which Rosneft directly and/or indirectly holds 20 or more percent in the charter capital of such entity;

**OPERATOR** – Rosneft;

**STRUCTURAL SUBDIVISION (SSD)** – structural subdivision of Rosneft with independent functions, objectives and responsibility within the limits of its competence, as defined in the Regulation on structural subdivision;

**ROSNEFT TOP MANAGERS** - Rosneft First Vice Presidents, Vice Presidents, Chief Accountant, Chief Financial Officer, Advisors and Heads of Rosneft structural subdivisions and services in the rank of Vice President.

### 3. PRINCIPLES AND OBJECTIVES OF PERSONAL DATA PROCESSING

3.1. Personal data shall be processed in Rosneft taking into consideration the required degree of protection of the rights and freedoms of Rosneft employees and other individuals, including protection of the privacy rights, personal and family secrets, on the basis of the following principles:

- Processing of personal data shall be performed on a legitimate and equitable basis;
- Processing of personal data shall be limited to attainment of specific, predetermined and legitimate objectives;
- Processing of personal data, in any way inconsistent with the purpose of personal data collection, shall be prohibited;
- Integration of databases containing personal data and its processing for inconsistent purposes shall be prohibited;
- Personal data may be processed only for the intended purposes;
- The contents and extent of processed personal data shall correspond to the stated processing purposes. Redundancy of processed personal data in relation to the stated objectives of processing shall be avoided;
- Processing of personal data shall ensure accuracy of personal data, its reliability and, if necessary, relevance in relation to objectives of personal data processing. Rosneft shall take or ensure appropriate measures aimed at deletion or rectification of incomplete or inaccurate personal data;
- Personal data shall be stored in a form, which ensures identification of individual, for a period not exceeding the time sufficient and consistent for the purpose of personal data processing, unless exact time for storing of personal data is prescribed by Federal Laws or contracts, where the individual is a party, beneficiary or guarantor thereunder; and
- Processed personal data shall be destructed or depersonalized after attainment of the processing objectives or in cases, where attainment of such objectives is no longer needed, unless otherwise foreseen by Federal Laws.

3.2. Processing of personal data in Rosneft shall be performed for the purpose of assistance to job candidates and employees in training and promotion, registration with military authorities and exemption of employees from active duty, for the purpose of observance of requirements of applicable laws in part related to disclosure of information on the members of Rosneft management and control bodies, enforcement of the rights of Rosneft shareholders, as well as Rosneft observing the requirements of applicable laws of the Russian Federation on counteractions against unauthorized use of insider information and market manipulation, including regulatory legal acts adopted in accordance with such laws, as well as the requirements of Rosneft Regulation “On insider information” № P3-01.04 R-0014 UL-001, including:

- Enforcement of the employee’s constitutional right to rest;
- Organization of mandatory individual (personified) registration of employees in the system of statutory pension insurance;
- Regulation of relations with employees of the Pension Fund system of the Russian Federation and employees of non-governmental pension funds;



- Creating required conditions for accessibility and high quality of medical care provided in the frameworks of statutory and voluntary health insurance;
- Preparation and issuance of documents and certificates for state, industry-wide and corporate awards;
- Provision of incentives to employees for attainment of high results;
- Confirmation of employee's compliance with his/her position;
- Creation of required conditions for efficient interaction between Rosneft employees in the course of performance of their functional duties;
- Creation of required conditions for continuous professional development and vocational training of Rosneft employees;
- Ensuring the required level of professional and technical competencies of employees corresponding to current and perspective business needs of Rosneft;
- Upgrading of Rosneft managerial potential, inter alia, by way of recognition of the best and most perspective employees, their training and promotion to the key managerial positions;
- Ensuring continuous inflow of highly educated young professionals capable of providing perspective business solutions;
- Creation of required conditions for adaptation of young specialists to current working environment, shaping and developing their professional knowledge, practices and skills;
- Creation of healthy and safe working environment for employees;
- Ensuring correspondence of employee's health status to the entrusted job, as well as early diagnosis and disease prevention;
- Prevention of occupational traumatism;
- Granting Rosneft employees and their family members with additional guaranties and compensations, including non-governmental pension coverage, voluntary health insurance, medical care and other types of social security;
- Preparation, conclusion, fulfillment and termination of agreements with contractors;
- Securing pass control and internal access regime on the production sites and offices of Rosneft;
- Preparation of reference materials for internal informational support of Rosneft business, including its branches, representative offices and Group Entities;
- Enforcement of court decisions, including orders of other authorities or officials enforceable in accordance with applicable laws of the Russian Federation in part related to enforcement proceedings;
- Securing the rights and legitimate interests of Rosneft in the course of its business transactions foreseen by Rosneft Charter and other local regulatory documents of Rosneft or third parties, or attainment of socially important objectives; and
- For other legitimate purposes.

### 3.3. Confidentiality regime in relation to personal data shall be abolished:

- In case of its depersonalization;
- Upon expiry of 75 years of its filing; and
- In other cases foreseen by Federal Laws.

## 4. LIST OF PERSONAL DATA BEING PROCESSED IN ROSNEFT

4.1. Rosneft shall be authorized to process personal data on the following categories of individuals:

- Employees of SSD, branches and representative offices of Rosneft;
- Members of Rosneft Board of Directors and Audit Committee, candidates to Rosneft Board of Directors and Audit Committee, as well as individuals, included or proposed for inclusion in the List of Rosneft insiders or excluded from such List;
- Rosneft shareholders;
- Employees of GEs;
- Candidates to relevant positions in Rosneft and GEs in accordance with the Company's Regulation "The procedure of validation of candidates to managerial positions in Rosneft Entities (except for the sole executive body of the Group Entity and directors of branches and representative offices of Key Group Entities)" № P2-03 R-0109;
- Students of state and non-governmental institutions of higher professional education, studying the professions claimed by Rosneft, and students of "Rosneft Classes";
- Other individuals (for the purpose of attainment of the processing objectives specified in Section 3 of this Regulation).

4.2. Depending on the objectives specified in Section 3 of this Regulation, Rosneft shall be authorized to process the following types of individuals' personal data:

- Surname, first name and patronymics (including new surname, first name and patronymics in case of their alteration);
- Information on the citizenship (including previous or other citizenships);
- Year, month, date and place of birth;
- Gender;
- Photograph;
- Type, series and number of identification document, date of issuance, name of issuing authority;
- Address and date of registration at the place of residence (domicile) and actual address;
- Contact phone number or information on other means of communication, including e-mail address;
- Individual's actual or scheduled transactions in Rosneft financial instruments (securities, including shares of Rosneft or their derivatives, the prices for which depends on Rosneft securities);
- Profession;
- Information on education (when and what educational, scientific and other organizations graduated from, numbers of documents on education, field of study or speciality according to the document on education, qualification);
- Academic degree, academic status;

- Series, number and date of issuance of the document on advanced training or retraining;
- Insurance number of the individual ledger account registered in accordance with applicable laws of the Russian Federation on individual (personified) record-keeping in the system of statutory pension insurance (if available) (SNILS);
- Taxpayer's identification number;
- Name of Rosneft structural subdivision;
- Employee's code number;
- Position;
- Terms and conditions of employment contract;
- Fixed official salary;
- Marital status and composition of the family;
- Information on relatives (wife (husband), including former ones, father, mother, adoptive parents, adopted children, full-blooded and half-blooded (having common father or mother) brothers and sisters, children), including degree of kinship, surname, first name and patronymics, year, month, date and place of birth, citizenship, place of work, position, domicile address, as well as where from and when arrived;
- Information on relatives permanently residing (resided) abroad (inter alia, due to employment or education), specifying surname, first name and patronymics, degree of kinship, period of staying abroad;
- Information on conviction and/or administrative prosecution (upon entering employment connected with occupation or profession, where the Labor Code of the Russian Federation dated 30.12.2001 № 197-FZ or other Federal Laws prohibit employment of individuals with actual or cancelled conviction records or criminal prosecution);
- Number and series of foreign passport, specifying the date of issuance and the issuing authority;
- Information on leaving abroad (where, when and for what purposes);
- Information on the requests for departure abroad (entrance) to permanent place of residence in foreign country (when and where);
- Information on corporate, industry-wide and state awards (numbers of awards and numbers of certificates);
- Social benefits granted to the employee in accordance with applicable laws of the Russian Federation;
- Employment records starting from the first employment (including studying in university and vocational education institutions, military service, part-time and combined employment, entrepreneurship etc.), specifying month and year of hiring and dismissal, position, name of employer, its actual and legal address, including foreign address;
- Total years of employment of work;
- Years of employment in Rosneft and GEs;
- Information on certificates of clearance to state secrets;
- Information on annual paid leaves, educational leaves and unpaid leaves;
- Periods of employment included in the years of performance of specific types of works or works in specific environmental conditions, including employment in the Far North and

analogous territories;

- Experience of work in profile business;
- Experience of work valuable for Rosneft, managerial work, mentorship;
- Personal skills valuable for Rosneft;
- Final results of testing;
- Final opinion on the employee's compliance with requirements to occupied position;
- Results of certification for correspondence with requirements to occupied position;
- Results of evaluation of salient achievements of the employee;
- Results of evaluation of labor discipline observance;
- Results of evaluation of the employee's functional performance;
- Results of evaluation of the level of development of the employee's professional knowledge and skills;
- Recommendations on enrolment to candidates pool/status alteration;
- Recommendations on alteration of fixed salary/position;
- Recommendations on training and development;
- Speciality, subject and business line, where the mentor is capable of teaching newly hired employee on a high level;
- Grade point average;
- Level of professionalism (in opinion of his/her manager);
- Level of development of Rosneft key competencies (in opinion of his/her manager);
- Information on participation in large-scale profile projects;
- Information on participation in the program of Managerial Candidates Pool of Rosneft and GEs (in case of appointment to managerial position);
- Grounds for entitlement to benefits;
- Information on health status (disability), particulars and details of supporting document (certificate);
- Date of latest medical examination (in healthcare organizations (medical and preventive treatment centers, occupational pathology centers);
- Information on the employee's status (resident/non-resident);
- Social standing;
- Surname, first name, patronymics and place of work of parents of "Rosneft Classes" students;
- Information on participation in academic contests, Olympiads and the place taken;
- Passport details of persons accompanying "Rosneft Classes" students when making the lists of events participants;
- Information on the number of shares held by the shareholder of Rosneft as of the reporting date;
- Information on the amount of dividends accrued and paid to the shareholder on Rosneft shares for the defined period, as well as the amount of tax withheld on dividends;

- Information on participation of Rosneft shareholder in General Meetings of shareholders and voting by ballots;
- Military registration data on the employee, including:
  - ♦ Reserve category;
  - ♦ Military rank;
  - ♦ Staff (profile);
  - ♦ Military occupational speciality;
  - ♦ Fitness for military service according to health status;
  - ♦ Name of military registration and enlistment office at the place of residence;
  - ♦ Records on military or alternative civil service;
  - ♦ Exemption from active military service;
  - ♦ Enlistment in mobilization human reserve;
  - ♦ Knowledge of foreign languages, fluency, and
- Other personal data required for attainment of objectives foreseen in Section 3 of this Regulation.

4.3. Rosneft may issue internal reference materials, which, with prior written consent of relevant individual, unless otherwise foreseen by applicable laws of the Russian Federation in the field of personal data, may include:

- Surname, first name and patronymics;
- Position;
- Name of structural subdivision;
- Year and place of birth;
- E-mail address;
- Contact phone number;
- Information on profession; and
- Other personal data furnished by the employee for specified purposes.

## 5. ACQUISITION OF PERSONAL DATA

5.1. All personal data shall be obtained from the individual in person. In case personal data may be obtained only from a third party, then the individual shall be notified on the same in advance and with prior written consent. The employee of relevant SSD shall notify such individual about the purposes, supposed sources and methods of personal data acquisition, as well as on the nature of personal data to be acquired and consequences of default in providing written consent for its acquisition.

5.2. Rosneft shall prevent acquisition and processing of:

- Special categories of personal data related to race or national identity, political views, religious or philosophic beliefs, intimate life, except for cases foreseen by Part 2 Article 10 of the Federal Law dated 27.07.2006 № 152-FZ “On personal data”;
- Information on membership in public organizations and trade unionist activity of individuals, except for cases foreseen by the Labor Code of the Russian Federation dated 30.12.2001 № 197-FZ and other Federal Laws;
- Information on physiological and biological distinctions of an individual, which allow establishing his/her personal identity (biometric personal data), except for cases foreseen by Part 2 Article 11 of the Federal Law dated 27.07.2006 № 152-FZ “On personal data”, and except for photographic image required for single / multiple entry to the offices of Rosneft.

5.3. Rosneft shall be authorized to process personal data on individual only with his/her prior written consent.

Written consent of the individual for processing of his/her personal data shall contain:

- Surname, first name and patronymics, address of the individual, passport or ID card number, date of issuance and issuing authority;
- Surname, first name and patronymics, address of the individual’s representative, passport or ID card number, date of issuance and issuing authority, particulars and details of the power of attorney or other document confirming the authorities of such representative (when obtaining consent of the individual’s representative);
- Name and address of Rosneft;
- Purpose of personal data processing;
- List of personal data, processing of which requires consent of the individual;
- Surname, first name, patronymics and address of the person in charge of processing of personal data at the request of the Operator, in case processing is entrusted to such person;
- List of consented operations with personal data, general description of methods to be used by the Operator for personal data processing;
- Consent validity term, as well as procedure of its revocation;
- Signature of the individual.

5.4. Consent of the individual for processing of personal data shall not be required in the following cases:

- Processing of personal data in accordance with requirements of the Labor Code of the Russian

Federation dated 30.12.2001 № 197-FZ, applicable laws on joint stock companies, security markets, notary public services or other Federal Laws, specifying its purpose, terms and conditions of personal data acquisition and the list of individuals, whose personal data are subject to processing, as well as confirmed authorities of the employer;

- Processing of personal data for the purpose of fulfillment of employment contract or other agreement concluded with relevant individual;
- Processing of personal data for statistic or other scientific purposes, provided that such personal data are duly depersonalized; and
- Processing of personal data required for protection of life, health or other vital interests of the employee, in case obtaining of his/her consent is not feasible.

## 6. PROCEDURE OF PERSONAL DATA PROCESSING

6.1. The date of commencement of the employee's personal data processing shall be the effective date of his/her employment contract. The date of commencement of the candidate's personal data processing shall be the date of prior written consent for processing of his/her personal data.

The date of commencement of personal data processing of the member of Rosneft Board of Directors (member of the Audit Committee) shall be the date of his/her election by the General Meeting of Rosneft shareholders to relevant position. The date of commencement of personal data processing of the candidate to Rosneft Board of Directors (Audit Committee) shall be the date of receipt of his/her consent for election to the composition of relevant body.

The commencement of personal data processing of any other individual, specified in p. 4.1 of this Regulation, shall be the date of his/her prior written consent for processing of his/her personal data, or, in case such processing is performed in order to observe requirements of applicable laws of the Russian Federation, then it shall commence upon receipt of such data by Rosneft or its authorized representative.

In case personal data is processed electronically, specialists shall apply appropriate tools of information protection, as defined in the Company Regulation "Organization and ensuring of information security in personal data IT systems of Rosneft and its Group Entities № P3-11.01 R-0091.

6.2. Processing of the individual's personal data shall be discontinued (except for the procedure of its storing in accordance with applicable laws of the Russian Federation) upon attainment of the objectives of personal data processing or revocation of the individual's consent for processing.

6.3. Transfer and acquisition of personal data by Rosneft in the frameworks of interaction between SSD shall be performed exclusively for the purposes defined in this Regulation.

6.4. Acquisition of personal data by Rosneft HR Department from relevant SSD shall be performed only if obtaining of such personal data from the individual in person is not feasible, when this is required for prevention of threat to life or health of the individual or in cases foreseen by regulatory legal acts of the Russian Federation.

6.5. Upon transfer of any personal data to Rosneft for processing, Rosneft employees shall observe the following requirements:

6.5.1. Transfer the individuals' personal data only inside Rosneft in accordance with this Regulation;

6.5.2. Prevent disclosure of personal data on individuals to a third party without their prior written consent, except for cases, when this is required for prevention of threat to life or health, as well as in other cases foreseen by Federal Laws;

6.5.3. Permit access to personal data only to duly authorized employees of SSD. For this purpose, such employees may obtain only the personal data to the extent required for performance of relevant function (taking into consideration the requirements of Clause 9 of this Regulation);



6.5.4. Notify and warn the employees of SSD, who obtained personal data, that such information may be used only for the stated and legitimate purposes, and require such employees to confirm observance of this rule. Employees of SSD, who obtained personal data, shall be obliged to maintain the confidentiality regime;

6.5.5. Transfer the employee's personal data to his/her legitimate and duly authorized representatives in accordance with procedures prescribed by applicable laws of the Russian Federation, and limit such information exclusively to the extent required for performance of relevant functions by such representatives;

6.5.6. Never request any information on health status of the employee, except for information related to the labor abilities of such employee.

6.6. Collection, recording, systemization, accumulation and rectification (updating, alteration) of the individuals' personal data shall be performed by way of:

- Obtaining original copies of required documents (job application form, work record book, personal history statement and other documents deliverable to Rosneft);
- Processing of requests of Rosneft shareholders;
- Copying of original documents;
- Recording of information in accounting for (on paper and electronic media);
- Preparation of personal data in the course of HR activities, or in the course of activities related to occupational health;
- Rosneft observing the requirements of applicable laws of the Russian Federation on joint stock companies and security markets, on counteractions against unauthorized use of insider information and market manipulation, including regulatory legal acts adopted in accordance with such laws, as well as Rosneft Regulation "On insider information" № P3-01.04 R-0014 UL-001.

6.7. It shall be prohibited to acquire, process or attach to the personal data sheet of the employee any personal data not foreseen by applicable laws of the Russian Federation.

6.8. Rosneft employees, duly authorized for processing of information in personal data IT systems of Rosneft, may be granted with access to personal data only with due observance of all requirements of applicable laws of the Russian Federation and the Company Regulation "Organization and ensuring of information security in personal data IT systems of Rosneft and its Group Entities № P3-11.01 R-0091.

6.9. In the course of personal data processing, Rosneft shall:

- Take measures required and sufficient for observing the requirements of applicable laws of the Russian Federation and local regulatory documents of Rosneft in the field of personal data protection;
- Take appropriate legal, organizational and technical measures for protection of personal data against unauthorized or accidental access thereto, destruction, alteration, blocking, copying, provision, disclosure of personal data, as well as against other unauthorized activities in relation to personal data;
- Appoint an officer responsible for organization of personal data processing in Rosneft;
- Issue local regulatory documents related to processing and protection of personal data in

Rosneft;

- Familiarize Rosneft employees, branches and representative offices of Rosneft, directly engaged in processing of personal data, with provisions of applicable laws of the Russian Federation and local regulatory documents of Rosneft in the field of personal data, including applicable requirements to protection of personal data and training of such employees;
- Publish or otherwise provide unrestricted access to this Regulation;
- Duly notify individuals or their representatives on availability of personal data on relevant individuals, and provide opportunity for such individuals to be familiarized with such personal data upon request and/or inquiries of such individuals or their representatives, unless otherwise foreseen by applicable laws of the Russian Federation;
- Discontinue processing and destroy personal data in cases foreseen by applicable laws of the Russian Federation in the field of personal data;
- Perform other activities foreseen by applicable laws of the Russian Federation in the field of personal data.

6.10. Personal data on individuals may be transferred both in paper and electronic form (using local computer network or other media).

6.11. Transfer of personal data on individual to state authorities, as well as to the Bank of Russia, may be allowed exclusively within the limits of their competence on the basis of regulatory legal acts of the Russian Federation, which bind Rosneft to provide such data.

6.12. Upon transfer of personal data, Rosneft employee, in charge of such transfer, shall notify the persons, receiving such personal data, that such data may be used by them only for the stated processing purposes.

6.13. In case of transfer of personal data to state authorities, as well as to the Bank of Russia, responsibility for observance of requirements of applicable laws in the field of protection of individuals' rights shall be borne by relevant state authorities, as well as the Bank of Russia, if such data is acquired by the latter.

6.14. All documents (replies, notes, copies etc.) containing personal data, being transferred to relevant SSD or those transferred outside of Rosneft, shall bear the PERSONAL DATA mark. This mark shall be applied by Rosneft employee, who prepared the document, without inverted commas on the front page of the document in the upper right corner.

All documents containing personal data on Rosneft shareholders, being processed in Corporate Governance Department, may bear PERSONAL DATA mark taking into consideration the nature of transferrable information and its recipient. The list of such documents shall be defined in the order of the Director of Corporate Governance Department.

6.15. Storing and subsequent destruction of documents, containing personal data on individual, shall be performed in accordance with requirements of applicable laws of the Russian Federation, as well as local regulatory documents of Rosneft in the field of document flow management.

6.16. Rosneft employees shall not be allowed to perform trans-border transfer of personal data.

6.17. Documents, containing personal data, may be kept on working desks or in special folders of Rosneft employees only during the official business hours. After expiry of official business hours all documents shall be locked in cabinets.

6.18. Personal data on electronic media shall be protected in accordance with LRDs' requirements to information security. Access to information systems, containing personal data, shall be granted in accordance with requirements of access provision regulations.

6.19. In relation to separate documents, containing personal data, applicable laws of the Russian Federation may set forth special requirements to its storing, other than those foreseen in this Regulation. In such cases, the provisions of relevant regulatory legal acts of the Russian Federation shall apply.

6.20. Responsibility for security of personal data, processed in Rosneft personal data information systems, shall be relegated to the managers of SSD - owners of such information systems or their authorized representatives, or other officers as may be decided by the Operator's manager.

In particular, security of personal data shall be ensured through:

6.20.1. Defining the threats to security of personal data in the course of its processing in personal data IT systems.

6.20.2. Application of organizational and technical measures ensuring security of personal data in the course of its processing in personal data IT systems required for meeting the requirements to protection of personal data, which ensure the levels of personal data protection identified by the Government of the Russian Federation.

6.20.3. Application of duly evaluated correspondence of data protection tools.

6.20.4. Evaluation of efficiency of practical measures ensuring security of personal data prior to commissioning and start-up of personal data information systems.

6.20.5. Accounting of personal data hardware.

6.20.6. Detection of the facts of unauthorized access to personal data and adoption of appropriate measures.

6.20.7. Restoring of personal data modified or deleted due to unauthorized access thereto.

6.20.8. Setting forth the rules of access to personal data processed in personal data information system, as well as registration and accounting of all operations performed with personal data in personal data information system.

6.20.9. Control over practical measures ensuring security of personal data and the level of security of personal data information systems.

Requirements to protection of personal data in the course of its processing in personal data IT systems were defined by Resolution of the Government of the Russian Federation dated 01.11.2012 № 1119 "On approval of requirements to protection of personal data in the course of its processing in personal data IT systems" and the order of the RF Federal Service for Technical and Export Control dated 18.02.2013 № 21 "On approval of composition and content of organizational and

technical measures ensuring security of personal data in the course of its processing in personal data IT systems” and other regulatory legal acts of the Russian Federation.

Organizational measures ensuring security of personal data being processed in Rosneft personal data information systems shall include but not limited to:

- Appointment of the officer responsible for Rosneft observance of the Federal Law “On personal data”;
- Defining the list of documents containing personal data;
- Organization of security regime in premises containing hardware of personal data information systems, to prevent potential uncontrolled penetration or access of unauthorized persons to such premises;
- Ensuring security of media containing personal data;
- Appointment of officers responsible for security of personal data being processed in Rosneft personal data information systems;
- Approval of the list of employees granted with access to personal data processed in personal data IT systems for due performance of their functional duties;
- Familiarization of employees with applicable laws and local regulatory documents of Rosneft in the field of personal data protection;
- Smart arrangement of working stations precluding unauthorized use of protected information;
- Detection and elimination of violations of requirements to protection of personal data;
- Appointment of Rosneft officer by administrative order of Rosneft, who regularly (at least once a year), or upon any alteration of business processes, which may affect processing of personal data, shall organize:
  - ♦ Analysis of the LRD in the field of personal data processing for correspondence with requirements of applicable laws of the Russian Federation;
  - ♦ Verification of availability of permissive conditions for processing of personal data;
  - ♦ In case of processing of biometric or special categories of personal data - control over observance of permissive conditions for such processing, including control over observance of the requirements to its protection;
  - ♦ Verification of appointment of the officer responsible for organization of processing and protection of personal data;
  - ♦ Verification of availability of the notice on processing of personal data and information on actual activities contained therein; in case of non-compliance - verification of availability of notices on relevant alterations;
  - ♦ Control over observance of requirements to protection of personal data in case of its processing by third parties;
  - ♦ Control over observance of requirements to destruction of personal data after attainment of the objectives of its processing or upon revocation of the individual’s consent for its processing;
  - ♦ In case of trans-border transfer of personal data - control over observance of its conditions, including control over observance of the requirements to protection of personal data;

- ◆ Verification of availability and correspondence of content of prior written consent of the individual for processing of his/her personal data with the stated and actual objectives of its processing;
- ◆ Control over observance of requirements to protection of personal data in the course of interaction with third parties (contractors, partners, auditors etc.);
- ◆ Verification of the fact of familiarization of employees, engaged in processing of personal data, with requirements of applicable laws of the Russian Federation, Rosneft LRDs and/or appropriate training of such employees in the field of processing and protection of personal data;
- ◆ Drafting of the plan of actions aimed at protection of personal data;
- ◆ Drafting of the plan of internal audits of the status of personal data protection;
- ◆ Drafting of reports for Rosneft Top Managers based on results of such audit;
- ◆ Review of documents regulating establishment of committees defining the level of personal data protection, specifying their composition;
- ◆ Verification of the list of personal data information systems, involved in processing of personal data, availability of timely updated reports on the levels of protection of personal data processed in personal data information systems;
- ◆ Verification of the list of applicable organizational and technical measures ensuring security of personal data being processed in personal data information system, their correspondence with prescribed level of protection and technical documentation;
- ◆ Verification of availability and timely updating of the lists of personal data and its media used in personal data IT systems;
- ◆ Verification of availability and timely updating of the lists of officers, who need the access to personal data being processed in personal data information systems;
- ◆ Verification of availability and timely updating of applicable matrixes of access to personal data information systems;
- ◆ Verification of timely updating of particular models of threats to security of personal data in the course of its processing in personal data information systems;
- ◆ Verification of timely updating of certificates and expert opinions of the RF Federal Service for Technical and Export Control and FSS based on evaluation of correspondence of data protection tools ensuring security of personal data in the course of its processing, using duly certified data protection tools;
- ◆ Review of documents regulating the procedure of maintenance and informational-legal support of personal data information systems;
- ◆ Drafting of reports for Rosneft Top Managers based on results of audits.

6.21. Processing of personal data in Rosneft shall be performed applying the following methods:

- Non-automated processing of personal data;
- Automated processing of personal data with transfer of acquired information via information and telecommunication networks or without such networks; and
- Combined processing of personal data.

In the course of non-automated processing, personal data may be recorded on paper and other

material media, where information is read-out without the use of computer equipment.

In the course of non-automated processing of personal data, recording of personal data on any material media, if it is processed for any purposes other than those specified in p.3.2 of this Regulation, shall be prohibited.

In case of inconsistency of the objectives of non-automated processing of personal data, recorded on a single material medium, if such medium preclude processing of personal data separately from other personal data recorded on the same material medium, then appropriate measures shall be taken aimed at separate processing of personal data, in particular:

- In case of necessity of the use or disclosure of certain personal data separately from other personal data stored on the same medium, then personal data, requested for such disclosure or use, shall be copied by a method precluding simultaneous copying of personal data, restricted for disclosure or use, and the copy of such personal data may be used or distributed;
- In case of necessity of destruction or blocking of a portion of personal data, the responsible employees shall destroy or block the material medium with prior copying of information, not selected for destruction or blocking, by a method precluding simultaneous copying of personal data selected for blocking or destruction.

Destruction or depersonalization of a portion of personal data, in case the material medium is capable of such operation, may be performed by a method precluding further processing of such personal data, preserving the option of processing other information recorded on such material medium (deletion, striking out).

Non-automated processing of personal data shall be performed in a way ensuring issuance of the list of employees, engaged in processing of personal data or having access thereto. Employees, engaged in processing of personal data without the use of automation equipment, shall be duly informed on the fact of personal data processing by them without the use of automation equipment, category of processed personal data, as well as particulars and rules of such processing.

Non-automated processing of personal data shall be performed in a way ensuring exact location of the place of personal data (material media) storing.

Organizational measures, ensuring security of personal data in the course of non-automated processing in Rosneft, shall include but not limited to:

- Appointment of the officer responsible for Rosneft observance of the Federal Law “On personal data”;
- Defining the list of documents and material media containing personal data;
- Organization of security regime in premises containing material medium / media of personal data, to prevent potential uncontrolled penetration or access of unauthorized persons to such premises;
- Ensuring security of media containing personal data;
- Appointment of officers responsible for security of personal data in case of its non-automated processing in Rosneft;
- Approval of the list of employees granted with access to personal data for due performance of their functional duties;
- Familiarization of employees with applicable laws and local regulatory documents of Rosneft

in the field of personal data protection;

- Smart arrangement of working stations precluding unauthorized use of protected information;
- Detection and elimination of violations of requirements to protection of personal data;
- Appointment of Rosneft officer by administrative order of Rosneft, who regularly (at least once a year), or upon any alteration of business processes, which may affect processing of personal data, shall organize:
  - ♦ Analysis of the LRD in the field of personal data processing, for correspondence with requirements of applicable laws of the Russian Federation;
  - ♦ Verification of availability of permissive conditions for processing of personal data;
  - ♦ In case of processing of biometric or special categories of personal data - control over observance of permissive conditions for such processing, including control over observance of the requirements to its protection;
  - ♦ Verification of appointment of the officer responsible for organization of processing and protection of personal data;
  - ♦ Verification of availability of the notice on processing of personal data and information on actual activities contained therein; in case of non-compliance - verification of availability of notices on relevant alterations;
  - ♦ Control over observance of requirements to protection of personal data in case of its processing by third parties;
  - ♦ Control over observance of requirements to destruction of personal data after attainment of the objectives of its processing or upon revocation of the individual's consent for its processing;
  - ♦ In case of trans-border transfer of personal data - control over observance of its conditions, including control over observance of the requirements to protection of personal data;
  - ♦ Verification of availability and correspondence of content of prior written consent of the individual for processing of his/her personal data with the stated and actual objectives of its processing;
  - ♦ Control over observance of requirements to protection of personal data in the course of interaction with third parties (contractors, partners, auditors etc.);
  - ♦ Verification of the fact of familiarization of employees, engaged in processing of personal data, with requirements of applicable laws of the Russian Federation, Rosneft LRDs and/or appropriate training of such employees in the field of processing and protection of personal data;
  - ♦ Drafting of the plan of actions aimed at protection of personal data;
  - ♦ Drafting of the plan of internal audits of the status of personal data protection;
  - ♦ Drafting of reports for Rosneft Top Managers based on results of such audit.

6.22. Rosneft shall collect and store the following sets of documents containing data on individuals in singular or consolidated form:

6.22.1. Documents containing personal data on individuals:

- Sets of documents accompanying the process of formalization of employer-employee relations

upon hiring, relocation and dismissal;

- Package of materials related to questionnaires, testing, performance assessment, interviews with candidate to relevant position;
- Employment contracts and additional agreements to employment contracts;
- Original documents and copies of personnel order;
- Personal data sheets and work record books of employees;
- Military registration cards;
- Files containing substantiation of personnel orders;
- Files containing materials of employees' certification;
- Files containing materials of internal investigations;
- References and information databank on personnel (card index files, registers);
- Card index files with personal cards of employees bound to military service;
- Lists for notification of Rosneft employees in case of emergency, as well as for broadcasting of civil defense signals;
- Information on trainings completed in Rosneft;
- Original documents and copies of reports, analytical and reference materials, made available to Top Managers of Rosneft and its SSDs;
- Copies of reports, forwarded to state statistic authorities and tax inspectorates;
- Package of documents containing substantiation of inclusion (exclusion) of the individuals in the list (from the list) of Rosneft insiders;
- Notices on inclusion (exclusion) of the individuals in the list (from the list) of Rosneft insiders;
- Lists of Rosneft insiders;
- Notices Individual's actual or scheduled transactions in Rosneft financial instruments (securities, including shares of Rosneft or their derivatives, the prices for which depends on Rosneft securities);
- Other documents for the purpose of Rosneft observing the requirements of applicable laws of the Russian Federation on counteractions against unauthorized use of insider information and market manipulation, including regulatory legal acts adopted in accordance with such laws;
- Information on the results of passed compulsory medical examination (screening) (only in the frameworks of Article 83 of the Labor Code of the Russian Federation dated 30.12.2001 № 197-FZ);
- Description of working environment at the working places of employees, based on results of labor conditions evaluation;
- Documents connected with Rosneft fulfillment of its commitments to the shareholders, including:
  - ◆ Lists of Rosneft shareholders attending the meeting and abstracts from such lists;
  - ◆ Lists of Rosneft shareholders for payment of dividends (dividend statements) and abstracts from such statements;
  - ◆ Amendments to the list of Rosneft shareholders for payment of dividends;



- ◆ Reports on payment of dividends to Rosneft shareholders;
  - ◆ Requests for payment of dividends to Rosneft shareholders;
  - ◆ Ballots for voting at the General Meeting of Rosneft shareholders;
  - ◆ Lists of persons participated in the General Meeting of Rosneft shareholders;
  - ◆ Documents confirming authorities of shareholders' representatives participated in the General Meeting of Rosneft shareholders; and
- Other documents containing personal data on individuals generated in the course of Rosneft transactions.

6.22.2. Rosneft shall issue and store documents connected with Rosneft fulfillment of its commitments to the shareholders, including:

- Lists of Rosneft shareholders attending the meeting and abstracts from such lists;
- Lists of Rosneft shareholders for payment of dividends (dividend statements) and abstracts from such statements;
- Amendments to the list of Rosneft shareholders for payment of dividends;
- Reports on payment of dividends to Rosneft shareholders;
- Requests for payment of dividends to Rosneft shareholders;
- Ballots for voting at the General Meeting of Rosneft shareholders;
- Lists of persons participated in the General Meeting of Rosneft shareholders; and
- Documents confirming authorities of shareholders' representatives participated in the General Meeting of Rosneft shareholders.

6.22.3. Documents related to organization of SSD's activities:

- Regulation on SSD; and
- Job descriptions of employees.

6.22.4. Documents connected with accrual and payment of salaries to employees.

6.22.5. Documents connected with settlement of civil lawsuits against Rosneft lodged by employees (former employees), shareholders and other stakeholders.

6.22.6. Documents connected with Rosneft handling and settlement of complaints, inquiries and other requests of employees, former employees, shareholders or other persons on any issues related to Rosneft business.

## 7. RIGHTS AND OBLIGATIONS OF INDIVIDUALS, WHOSE PERSONAL DATA IS PROCESSED IN ROSNEFT

7.1. Individuals, whose data are allowed for processing in Rosneft, shall be obliged to:

- Provide reliable personal information and documents containing personal data, composition of which is defined by applicable laws of the Russian Federation and local regulatory documents of the Company to the extent required for processing objectives;
- Within 7 (seven) working days from the date of alteration of personal data/documents containing personal data, inform Rosneft HR Department on any rectifications (updating, alteration) of his/her personal data;
- Provide information on transactions in Rosneft financial instruments (securities, including shares of Rosneft or their derivatives, the prices for which depends on Rosneft securities) planned and/or closed by Rosneft insider to Rosneft Corporate Governance Department in accordance with procedure and in time defined in Rosneft Regulation “On insider information” № P3-01.04 R-0014 UL-001.

7.2. Individuals, whose data are allowed for processing in Rosneft, shall have the right to:

- Free familiarization with their personal data, except for cases foreseen by the Federal Law dated 27.07.2006 № 152-FZ “On personal data”, as well as for obtaining copies of any records containing personal data;
- Obtaining full information on processing of their personal data in Rosneft, including:
  - ♦ Confirmation of the fact of personal data processing;
  - ♦ Legal grounds and objectives of personal data processing;
  - ♦ Objectives and Rosneft methods of personal data processing;
  - ♦ Name and place of Rosneft location, information on persons (except for Rosneft employees) having access to personal data, or persons, to whom personal data might be disclosed on the basis of a contract with Rosneft or on the basis of the Federal Law;
  - ♦ Processed personal data on relevant individual, source of its acquisition, unless other procedure of acquisition of such information is foreseen by Federal Laws;
  - ♦ Time allowed for personal data processing, including the time of its storing;
  - ♦ Enforcement of individual’s rights foreseen by the Federal Law dated 27.07.2006 № 152-FZ “On personal data”;
  - ♦ Information on default of trans-border transfer of information;
  - ♦ Surname, first name, patronymics and address of the individual in charge of processing of personal data at the request of Rosneft, in case processing is assigned or entrusted to such person; and
  - ♦ Other information foreseen by the Federal Law dated 27.07.2006 № 152-FZ “On personal data” or other Federal Laws;
- Request exclusion or correction of incorrect or incomplete personal data, as well as information processed in violation of provisions of the Labor Code of the Russian Federation dated 30.12.2001 № 197-FZ and Federal Law dated 27.07.2006 № 152-FZ “On personal data”;

- Request notification of all persons, who might have received incorrect or incomplete personal data, specifying all and any effective exclusions, corrections or amendments;
- Request destruction of his/her personal data upon attainment of processing objectives;
- Challenge all and any unauthorized actions or omissions during processing and protection of his/her personal data.

## 8. RIGHTS AND OBLIGATIONS OF ROSNEFT EMPLOYEES PROCESSING PERSONAL DATA ON INDIVIDUALS

8.1. In the course of processing of personal data, Rosneft employees, engaged in data processing, depending on the processing objectives specified in Section 3 of this Regulation, shall be authorized to:

- Acquire documents containing personal data; and
- Request the individual's timely verification of presented personal data.

8.2. Rosneft employees, engaged in data processing, shall be obliged to:

- Process the acquired personal data in accordance with procedures prescribed by applicable laws;
- Consider requests of the individual (his/her legitimate representative, authorized agency on protection of individuals' rights) and provide motivated response in time not exceeding 30 (thirty) calendar days from the date of request's receipt;
- Provide the individual (his/her legitimate representative) with free access to his/her personal data processed in Rosneft;
- Take measures aimed at rectification or destruction of personal data on individual in case the latter (his/her legitimate representative) lodges legitimate and substantiated request;
- Explain to individual legal consequences of his/her default in provision of personal data;
- Destroy personal data on individual in time not exceeding 30 (thirty) calendar days from the date of attainment objectives of its processing, taking into consideration the time of documents storing prescribed by applicable laws;
- Organize current and archive storing of Rosneft documents containing personal data on individuals in accordance with requirements of applicable laws of the Russian Federation.

## 9. ACCESS TO PERSONAL DATA

9.1. Internal access (access inside Rosneft) to personal data shall be granted to the following officers and employees:

9.1.1. Unrestricted access:

- Chief Executive Officer of Rosneft;
- Rosneft Vice President on HR and social issues;
- Rosneft Vice President, the Head of Security Service.

9.1.2. Limited access:

- Rosneft Top Managers and managers of SSDs - to personal data on employees of relevant business line;
- Employees of SSD in accordance with administrative order of Rosneft on the access to personal data, defining categories of personal data, objectives of its processing and types of processing;
- Employees of OOO "RN-Accounting" - to personal data required for performance of the functions of accrual and payment of salaries and other statutory payments, as well as preparation and submission of regular accounting and tax reports;
- Employees of VBRR Bank (AO) - to personal data required for performance of the functions of payroll cards' servicing;
- Employees of AO "Sogaz" - to personal data required for performance of the functions of voluntary medical insurance; and
- Each employee, as the individual - to his/her personal data.

9.2. External access (access outside of Rosneft) to individuals' personal data processed in Rosneft may be granted to the following authorities and officials at their substantiated requests:

- Tax inspectorates;
- Law enforcement authorities;
- Courts;
- Statistic agencies;
- Military registration and enlistment offices;
- Social insurance agencies;
- Pension Funds;
- Other state agencies and organizations, as well as the Bank of Russia within the limits of their authorities;
- Auditors (in case the audit statement foresees such access);
- Notary Public; and
- Other officials in accordance with by Federal Laws.

9.3. Personal data on Rosneft employees, processed in Rosneft HR Department, may be made available to officers specified in p. 9.1.2 of this Regulation, only at written request (signed by the Head of SSD or his/her deputy) specifying the category of personal data and objectives of its collection. The requested personal data may be made available to authorized employees of SSD having access to personal data on the basis of administrative document of Rosneft.

Personal data on Rosneft employees, processed in Rosneft HR Department, may be made available to the state authorities and agencies, specified in p. 9.2 of this Regulation, only at their written requests and in time foreseen by applicable laws of the Russian Federation or in such requests.

Personal data on Rosneft shareholders, processed in structural subdivisions Rosneft in connection with fulfillment of its commitments to the shareholders, may be made available to the shareholders in accordance with applicable law on joint stock companies.

9.4. At written request of the officers specified in p. 9.1.2 of this Regulation, personal data (information) may be made available within 5 working days after receipt of such request or in time specified in such request.

9.5. Employees of Rosneft Security Service, admitted to processing of personal data in accordance with administrative order of Rosneft, in addition to the request on paper, drawn in accordance with p. 9.3 of this Regulation, may acquire such information from employees of Rosneft HR Department at the request to be sent to e-mail addresses of employees of Rosneft HR Department, engaged in processing of such personal data in accordance with administrative order of Rosneft.

## 10. LIABILITY FOR VIOLATION OF REQUIREMENTS TO PROCESSING OF PERSONAL DATA

10.1. Rosneft employees, admitted to processing of personal data and found guilty of violation of standards regulating processing of personal data on individuals, may be brought to disciplinary and material liability in accordance with procedures foreseen by the Labor Code of the Russian Federation dated 30.12.2001 № 197-FZ, Company Standard “Mechanism of compensation of losses and damages caused to the Company by actions (or omissions) of employees/officers, representatives of contractors and third parties” № P3-06 C-005, and may be brought to civil, administrative and criminal liability in accordance with procedures foreseen by Federal Laws.

10.2. In case of disclosure of personal data on the individual by Rosneft employee, admitted to its processing, Rosneft may terminate his/her employment contract in accordance with procedures foreseen by the Labor Code of the Russian Federation dated 30.12.2001 № 197-FZ.

10.3. Personal responsibility for observance of requirements of applicable laws of the Russian Federation and local regulatory documents of Rosneft in the field of personal data in structural subdivisions of Rosneft, its branches and representative offices, as well as for security of personal data in such subdivisions of Rosneft, shall be relegated to their heads and managers.

## 11. REFERENCES

1. Constitution of the Russian Federation;
2. Labor Code of the Russian Federation dated 30.12.2001 № 197-FZ;
3. Federal Law dated 27.07.2006 № 149-FZ “On information, information technologies and information protection”;
4. Federal Law dated 27.07.2006 № 152-FZ “On personal data”;
5. Federal Law dated 28.03.1998 № 53-FZ “On military duty and military service”;
6. Federal Law dated 26.02.1997 № 31-FZ “On mobilization preparedness and mobilization in the Russian Federation”;
7. Federal Law dated 27.07.2010 № 224-FZ «On counteractions against unauthorized use of insider information and market manipulation and introduction of amendments to certain legislative acts of the Russian Federation”;
8. Decree of the President of the Russian Federation dated 06.03.1997 № 188 “On approval of the List of confidential information”;
9. Resolution of the RF Government dated 15.09.2008 № 687 “On approval of Regulation on particulars of non-automated personal data processing”;
10. Resolution of the RF Government dated 01.11.2012 № 1119 “On approval of requirements to protection of personal data in the course of its processing in personal data IT systems”;
11. Order of the RF Federal Service for Technical and Export Control dated 18.02.2013 № 21 “On approval of composition and content of organizational and technical measures ensuring security of personal data in the course of its processing in personal data IT systems”;
12. Company Standard “Mechanism of compensation of losses and damages caused to the Company by actions (or omissions) of employees/officers, representatives of contractors and third parties” № P3-06 C-005, version 1.00, approved and enacted by the order Rosneft dated 28.05.2007 № 210;
13. Rosneft Regulation “On insider information” № P3-01.04 R-0014 UL-001 version 1.00, approved by the decision of Rosneft Board of Directors 30.06.2014 (minutes dated 30.06.2014 № 39), enacted by the order Rosneft dated 24.07.2014 № 353;
14. Company Regulation “Procedure of validation of candidates to managerial positions in Rosneft Entities (except for the sole executive body of the Group Entity and directors of branches and representative offices of Key Group Entities)” № P2-03 R-0109, version 3.00, approved and put into force by the order Rosneft dated 17.10.2016 № 582;
15. Company Regulation “Ensuring of information security in personal data IT systems of Rosneft and its Group Entities” № P3-11.01 R-0091, version 1.00, approved and put into force by the order Rosneft dated 28.11.2016 № 662.



# ATTACHMENTS

**Table 1**  
**List of Attachments to Rosneft Regulation**

ATTACHMENT NUMBER	TITLE	NOTES
1	2	3
1	Standard Form of consent for processing of personal data	Included in this file
2	Standard Form of revocation of consent for processing of personal data	Included in this file

## ATTACHMENT 1. STANDARD FORM OF CONSENT FOR PROCESSING OF PERSONAL DATA

### Consent for processing of personal data

Moscow " \_\_ " \_\_\_\_\_ 20\_\_

I, the undersigned \_\_\_\_\_,  
(Full Name)

registered at the address \_\_\_\_\_

passport series \_\_\_\_\_ № \_\_\_\_\_, issued on the \_\_\_\_\_

(date of issuance) (issuing authority)

acting freely, on my own will and in my interests, hereby give my consent to the authorized Rosneft employee, registered the address: Russian Federation, 115035, Moscow, Sofiyskaya Embankment 26/1, for processing (any activity (operation) or a combination of activities (operations) performed with the use of automation equipment or without thereof in relation to my personal data, including collection, recording, systemization, accumulation, storing, rectification (updating, alteration), retrieval, use, transfer (disclosure, provision, access), depersonalization, blocking, deletion or destruction) of the following personal data:

- Surname, first name and patronymics, date and place of birth, citizenship;
- Former surname, first name and patronymics, date, place and the reason of alteration (in case alteration);
- Photographic image;
- Foreign languages and languages of nationalities of the Russian Federation;
- Education (when and what educational institutions, numbers of diplomas, field of study or speciality according to diploma, qualification according to diploma);
- Postgraduate professional education (name of educational or academic institution, year of completion), academic degree, academic status (when awarded, numbers of diplomas, certificates);
- Employment records starting from the first employment (including military service, part-time and combined employment, entrepreneurship etc.);
- State awards, other awards and prizes (specify the award and when awarded);
- Degree of kinship, full names, dates of birth of close relatives (father, mother, brothers, sisters and children), as well as husband (wife);
- Staying abroad (when, where, for what purposes);
- Close relatives (father, mother, brothers, sisters and children), as well as husband (wife), including former ones, permanently residing abroad and/or in the process of obtaining documents for immigration to permanent place of residence in foreign country (surname, first name and patronymics, since when);
- Address of registration and actual address;
- Date of registration at the place of residence;
- Passport (series, number, specifying the date of issuance and the issuing authority);
- Other identification document of the citizen of the Russian Federation outside of the Russian Federation (series, number, specifying the date of issuance and the issuing authority);
- Contact phone number;
- E-mail address, including personal;

- Planned and/or closed transactions in Rosneft financial instruments (securities, including shares of Rosneft or their derivatives, the prices for which depends on Rosneft securities);
- Military enlistment duties, information of military registration (for reservists and persons subject to recruitment to military service);
- Taxpayer's identification number;
- Number of insurance certificate of statutory pension insurance;
- Permit to state secrets, obtained during employment, military service, education (form, number and date);
- Results of passed compulsory medical examination (screening), medical statements on acknowledgement of full or partial disablement, all issued in accordance with procedures foreseen by Federal Laws and other regulatory legal acts of the Russian Federation;
- Information on obtained certificates and licenses, as well as diplomas on completion of vocational training, certification or testing, including permits to execution of certain types of works;
- Other personal data required for attainment of other objectives for the entire period of employer-employee relations in Rosneft.

Hereby I confirm presentation of my personal data for processing in furtherance of observance of my legitimate rights and provisions of applicable laws of the Russian Federation in the field of labor relations and similar laws for the purpose of satisfying the authorities foreseen by Rosneft Charter, as well as assistance to employees in training and promotion, registration with military authorities and exemption of employees from active duty, for the purpose of observance of requirements of applicable laws in part related to disclosure of information on the members of Rosneft management and control bodies, as well as Rosneft observing the requirements of applicable laws of the Russian Federation on counteractions against unauthorized use of insider information and market manipulation, including regulatory legal acts adopted in accordance with such laws, including:

- Enforcement of the employee's constitutional right to rest;
- Organization of mandatory individual (personified) registration of employees in the system of statutory pension insurance;
- Regulation of relations with employees of the Pension Fund system of the Russian Federation and employees of non-governmental pension funds;
- Creating required conditions for accessibility and high quality of medical care provided in the frameworks of statutory and voluntary health insurance;
- Preparation and issuance of documents and certificates for state, industry-wide and corporate awards;
- Provision of incentives to employees for attainment of high results;
- Confirmation of employee's compliance with his/her position;
- Creation of required conditions for efficient interaction between Rosneft employees in the course of performance of their functional duties;
- Creation of required conditions for continuous professional development and vocational training of Rosneft employees;
- Ensuring the required level of professional and technical competencies of employees corresponding to current and perspective business needs of Rosneft;
- Upgrading of Rosneft managerial potential, inter alia, by way of recognition of the best and most perspective employees, their training and promotion to the key managerial positions;
- Ensuring continuous inflow of highly educated young professionals capable of providing perspective business solutions;

- Creation of required conditions for adaptation of young specialists to current working environment, shaping and developing their professional knowledge, practices and skills;
- Creation of healthy and safe working environment for employees;
- Ensuring correspondence of employee's health status to the entrusted job, as well as early diagnosis and disease prevention;
- Prevention of occupational traumatism;
- Granting Rosneft employees and their family members with additional guaranties and compensations, including non-governmental pension coverage, voluntary health insurance, medical care and other types of social security;
- Preparation, conclusion, fulfillment and termination of agreements with contractors;
- Securing pass control and internal access regime on the sites of Rosneft;
- Preparation of reference materials for internal informational support of Rosneft business, including its branches, representative offices, as well as its Group Entities
- Enforcement of court decisions, including orders of other authorities or officials enforceable in accordance with applicable laws of the Russian Federation in part related to enforcement proceedings;
- Securing the rights and legitimate interests of Rosneft in the course of its business transactions foreseen by the Charter and other local regulatory documents of Rosneft, or third parties or attainment of socially important objectives;
- For other legitimate purposes.

Hereby I give my consent for processing of my personal data to the following officers on the basis of contracts concluded with Rosneft:

- OOO "RN-Accounting" - personal data required for performance of the functions of accrual and payment of salaries and other statutory payments, as well as preparation and submission of regular accounting and tax reports;

- VBRR Bank (AO) - personal data required for performance of the functions of payroll cards' servicing;

- AO "Sogaz" - personal data required for performance of the functions of voluntary medical insurance.

I was duly notified that:

- 1) The consent for processing of personal data is valid from the date of signing of this document for the entire duration of employment contract concluded between Rosneft and me;
- 2) I may revoke the consent for processing of personal data at my written request in prescribed form;
- 3) In case of revocation of my consent for processing of personal data, Rosneft shall be authorized to continue processing of my personal data without my consent subject to the terms specified in pp. 2-11 Part 1 Article 6, Part 2 Article 10 and Part 2 Article 11 of the Federal Law dated 27.07.2006 № 152-FZ "On personal data";
- 4) After my dismissal (termination of employer-employee relations) from Rosneft, my personal data will be stored in Rosneft archive during the period of documents' storing foreseen by applicable laws of the Russian Federation;
- 5) Personal data deliverable in relation to third parties will be processed only for the purpose of satisfying Rosneft authorities and fulfillment of its obligations foreseen by Rosneft Charter.

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Hereby I confirm my awareness with provisions of the Federal Law dated 27.07.2006 № 152-FZ “On personal data” and Rosneft Regulation “On management of Rosneft employees’ personal Data” № P2-03 R-0415 UL-001.

Rights and obligations in the field of personal data protection were duly explained to me in person.

Date of commencement of personal data processing: \_\_\_\_\_  
(year, month, date)

\_\_\_\_\_  
(Signature)

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**ATTACHMENT 2. STANDARD FORM OF REVOCATION OF CONSENT FOR PROCESSING OF PERSONAL DATA**

Attn.: Chief Executive Officer of Rosneft

\_\_\_\_\_  
(Full Name)

**Revocation of Consent for Processing of Personal Data**

Moscow

“ \_\_\_ ” \_\_\_\_\_ 20\_\_

In furtherance of requirements of the Federal Law “On personal data” dated 27.07.2006 № 152-FZ, I, the undersigned \_\_\_\_\_,

(Full Name)

registered at the address \_\_\_\_\_

passport series \_\_\_\_\_ № \_\_\_\_\_, issued on the \_\_\_\_\_ by \_\_\_\_\_  
(date)

\_\_\_\_\_  
(issuing authority)

herewith revoke my consent for processing of personal data from Rosneft Oil Company (located at the address: Russian Federation, 115035, Moscow, Sofiyskaya Embankment 26/1) and its affiliated entities, which was granted on \_\_\_\_\_.

(year, month, date)

\_\_\_\_\_  
(Full Name, Signature)