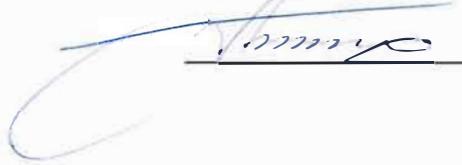




Joint Stock Company
Caspian Pipeline Consortium-R

APPROVED:

General Director

 N. Gorban

CASPIAN PIPELINE CONSORTIUM-R JOINT STOCK COMPANY
(CPC-R JSC)
PERSONAL DATA PROCESSING AND PROTECTION COMPLIANCE
POLICY

Revision 1

Put into effect by Resolution # Out-B-CPC-CR021 29.07.2021
Effective date 01.08. 2021

Moscow
2021

CPC-R	Personal Data Processing and Protection Compliance Policy Caspian Pipeline Consortium-R Joint Stock Company	Revision 1
-------	--	------------

CONTENTS

1. PURPOSE..... 3

2. SCOPE 3

3. REGULATORY REFERENCES 3

4. TERMS, DEFINITIONS AND ABBREVIATIONS..... 3

5. PROCESS DESCRIPTION..... 5

6. RESPONSIBILITY 6

7. FINAL PROVISIONS..... 7

8. LIST OF EXHIBITS 7

EXHIBIT 1 – REVISIONS LOG..... 8

CPC-R	Personal Data Processing and Protection Compliance Policy Caspian Pipeline Consortium-R Joint Stock Company	Revision 1
-------	--	------------

1. PURPOSE

1.1 This Personal Data Processing and Protection Compliance Policy is an internal regulation that is based on the applicable Russian laws on personal data protection and establishes general principles of personal data protection compliance by Caspian Pipeline Consortium-R Joint Stock Company. The Policy must be placed on the corporate website.

1.2 The principles and requirements set forth herein are binding upon all CPC-R employees.

2. SCOPE

2.1 All CPC-R employees abide by the requirements of this Policy.

3. REGULATORY REFERENCES

The following regulatory documents listed in Table 1 are referenced herein.

Table 1. List of Regulatory Documents

#	Regulatory Documents
1	Statutory
1.1	Federal Law of the Russian Federation No.152-FZ of 27.07.2006 “On Personal Data”
1.2	Russian Federation Government Decree No.687 of 15.09.2008 “On Approval of the Regulations on the Aspects of Non-Automated Personal Data Processing”
1.3	Russian Federation Government Decree No.1119 of 01.11.2012 “On Approval of the Requirements to the Protection of Personal Data Processed in Personal Information Systems”
1.4	Labor Code of the Russian Federation
2	Internal
2.1	CPC-R Regulations on Personal Data Processing and Protection, Revision No.2 (Resolution No.Out-B-CPCR-0165-2018 of 18.09.2018)
2.2	Information Security Management Policy STP IB of 01.01.2020, Revision No.3 (Resolution No.Out-B-CPCR-0002-2021 of 11.01.2021)

4. TERMS, DEFINITIONS AND ABBREVIATIONS

Terms and abbreviations used herein are listed in Table 2.

Table 2. Terms and Abbreviations

#	Term / Abbreviation	Term Definition / Key to Abbreviation
1		Terms
1.1	Company, Organization, Employer	Caspian Pipeline Consortium-R Joint Stock Company

CPC-R	Personal Data Processing and Protection Compliance Policy Caspian Pipeline Consortium-R Joint Stock Company	Revision 1
-------	--	------------

#	Term / Abbreviation	Term Definition / Key to Abbreviation
1.2	Employee	An individual who made an employment arrangement with the Employer under employment agreement and on other grounds provided for by the Russian Federation Labor Code
1.3	Personal data	Any information directly or indirectly related to a certain or identifiable individual (personal data owner)
1.4	Personal data owner	An individual identifiable, directly or indirectly, by reference to personal data. Personal data owners hereunder are deemed individuals employed by CPC under employment agreement (employees); individuals applying for vacant positions; individuals rendering services/performing work under paid services agreement; interns; visitors; employees' family members for the purpose of voluntary medical insurance agreement; recipients of alimony/child support payments; individuals nominated as beneficiaries under accident and disease insurance agreement; individuals nominated as heirs under non-government pension plan agreement; individuals receiving charitable support and their legal representatives
1.5	Personal data processing	Any automated or non-automated action (operation) or a number of such actions (operations) performed with regard to personal data, including collection, recording, systematization, accumulation, storage, finalization (update, change), retrieval, use, transfer (dissemination, provision, access), anonymization, blocking, deletion, and destruction of personal data
1.6	Operator	In this instance, a legal entity (CPC-R) that in its own right or together with other entities organizes and (or) undertakes personal data processing, as well as determines the purpose of personal data processing, composition of personal data subject to processing, action (operations) with personal data
1.7	Personal data owner's consent to the processing of his/her personal data	Personal data owner's written consent to the processing of his/her personal data by CPC-R in accordance with the CPC-R Regulations on Personal Data Processing and Protection
1.8	Cross-border personal data transfer	Transfer of personal data to the territory of foreign states
2	Abbreviations	
2.1	CPC-R JSC, CPC-R	Caspian Pipeline Consortium-R Joint Stock Company
2.2	Roskomnadzor	Federal Service for Supervision of Communications, Information Technology and Mass Media of the Russian Federation (Roskomnadzor)

CPC-R	Personal Data Processing and Protection Compliance Policy Caspian Pipeline Consortium-R Joint Stock Company	Revision 1
-------	--	------------

5. PROCESS DESCRIPTION

5.1 Caspian Pipeline Consortium-R Joint Stock Company (hereinafter CPC-R) processes personal data as part of its base business operations. The objective of personal data processing, their composition, content and categories of personal data owners whose data are processed by CPC-R are outlined in the notification of personal data processing to the authorized agency for protection of personal data owners' rights (Roskomnadzor) and updated if changed.

5.2 For the purpose of maintaining its business reputation and complying with Federal Law No.152-FZ of 27.07.2006 "On Personal Data" and associated regulations, CPC-R, in the capacity of personal data operator with relevant rights and obligations, ensures the lawful processing and proper protection of the personal data.

5.3 CPC-R processes the personal data on a lawful and fair basis to the extent of achieving specific, predetermined and legal objectives. Only personal data satisfying the processing objectives are processed. The content and scope of the processed personal data are consistent with the processing objectives; no data redundancy is allowed.

5.4 When processing the personal data, CPC-R ensures their accuracy, sufficiency and, where necessary, relevance with respect to the objectives of personal data processing. CPC-R takes and causes necessary measures to be taken to destroy or update incomplete or inaccurate personal data.

5.5 CPC-R stores the personal data in a form allowing identification of a personal data owner only as long as needed for achieving the personal data processing objectives if no storage period is stipulated in the Russian Federation legislation or in the agreement to which the personal data owner is a party, beneficiary or guarantor. Personal data are destroyed or anonymized after the processing objectives are achieved or no longer need to be achieved unless otherwise provided for by the applicable Russian law.

5.6 Personal data related to health status are processed if written consent to the processing of the said data has been received from the personal data owner or in other cases explicitly stipulated in the applicable Russian law.

5.7 CPC-R processes biometric personal data only for access control purposes subject to written consent of the personal data owner.

5.8 CPC-R does not place the personal data of the personal data owner in the public domain without his/her written consent.

5.9 In the course of its operations, CPC-R may cause a third party to process the personal data subject to consent of the personal data owner unless otherwise provided for by the applicable Russian law. If a third party is engaged to process the personal data, such third party is mandated to respect confidentiality and protect the personal data when processing them.

5.10 In the course of its activities, CPC-R performs a cross-border transfer of personal data to legal entities located in foreign states. This being the case, such issues as ensuring an adequate protection of the rights of personal data owners and ensuring the security of their personal data during the cross-border transfer are a priority for CPC-R, being addressed in compliance with Russian Federation legislation on personal data protection.

5.11 Personal data may be transferred across the border to the territory of foreign states which do not provide adequate protection of personal data owners' rights only if the personal data owner

CPC-R	Personal Data Processing and Protection Compliance Policy Caspian Pipeline Consortium-R Joint Stock Company	Revision 1
-------	--	------------

gives his/her written consent to a cross-border transfer of his/her personal data or in other cases stipulated in the applicable law.

5.12 For the purpose of adequate personal data protection, CPC-R assesses damage that may be inflicted on the personal data owner by a breach of his/her personal data security and detects relevant security threats to the personal data processed in personal information systems.

5.13 For the purpose of personal data security, CPC-R takes necessary and sufficient measures from a legal, organizational and technical standpoint to protect the personal data against any unlawful or accidental access, destruction, change, blocking, reproduction, disclosure, dissemination or other unlawful acts.

5.14 CPC-R protects the personal data from an organizational and technical standpoint on legal grounds, as well as in compliance with the Russian Federation laws on personal data processing.

5.15 CPC-R Management understands the importance and indispensability of personal data security and promotes a continuous enhancement of CPC-R personal data protection system.

5.16. CPC-R has persons nominated as responsible for organizing the processing and ensuring security of the personal data. The contact details of the person responsible for organizing personal data processing in CPC-R are provided in the notification of personal data processing to the authorized agency for protection of personal data owners' rights (Roskomnadzor).

5.17 CPC-R has a person nominated to be in charge of organizing the processing and ensuring security of the personal data. The contact details of the person responsible for organizing personal data processing and protection in CPC-R are provided in the notification of personal data processing to the authorized agency for protection of personal data owners' rights (Roskomnadzor).

5.18 Each CPC-R employee who is directly involved in personal data processing shall read the Russian Federation laws on personal data processing and security, this Policy and other CPC-R regulations on personal data processing and protection compliance, and shall be responsible for adherence thereto.

5.19. The provisions hereof are binding upon all CPC-R employees who have access to personal data.

5.20 Access to personal data is granted only to the employees who need such access to perform their job duties and are deemed personally accountable.

5.21 When collecting personal data, CPC-R records, systematizes, accumulates, stores, finalizes (updates, modifies) and retrieves the personal data using data bases located in the territory of the Russian Federation.

5.22 The provisions of this Policy serve as basis for organizing personal data processing in CPC-R, including for developing internal regulations (procedures, guidelines, process flowcharts, etc.) governing personal data processing in CPC-R.

6. RESPONSIBILITY

6.1 The responsibility for the development and update of the Caspian Pipeline Consortium-R Personal Data Processing and Protection Compliance Policy lies with Human Resources, General Business Department.

CPC-R	Personal Data Processing and Protection Compliance Policy Caspian Pipeline Consortium-R Joint Stock Company	Revision 1
-------	--	------------

7. FINAL PROVISIONS

7.1 This Policy is put into effect by the General Director’s Resolution.

7.2 Any matters that are not addressed herein are governed by the applicable laws of the Russian Federation.

7.3 This Policy is in the public domain and must be placed on the official CPC-R website or otherwise be available to the public.

8. LIST OF EXHIBITS

List of exhibits to the Policy is given in Table 1.

Table 1. List of Exhibits

Exhibit	Title
1.	Revisions Log

