




Каспий Құбыр Консорциумы-Қ
Акционерлік Қоғамы

Joint Stock Company
Caspian Pipeline Consortium-K

APPROVED
General Director


N. Gorban

**CASPIAN PIPELINE CONSORTIUM-K JOINT STOCK COMPANY
(CPC-K JSC) POLICY
WITH REGARD TO PERSONAL DATA PROCESSING AND
PROTECTION COMPLIANCE**

Revision No. 1

Put into effect by Resolution # Act-B-CPC-K-0093-2021 29.07.2021
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CPC-K	CPC-K JSC Personal Data Processing and Protection Compliance Policy	Revision No. 1
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1. PURPOSE

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

2. SCOPE

2.1 All CPC-K current and former employees and other parties related to personal data protection shall abide by the requirements of this Personal Data Protection Policy.

3. REGULATORY REFERENCES

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

Table 1. List of Regulatory Documents

No.	Regulatory Documents
1	External
1.1	Republic of Kazakhstan Law № 94-V ZRK of 21.05.2013 “On personal data and protection thereof”
1.2	RK Government Resolution of 03.09.2013 № 909 «Re Approval of the Rules Established for Personal Data Protection by the Owners/Operators and Third Parties»
1.3	Resolution No. 1214 dated 12 November 2013 “On Approval of the Rules for Determination by the Owner and (or) Operator of the Schedule of Personal Data Required and Sufficient for Its Operating Objectives” issued by the Government of the Republic of Kazakhstan
1.4	Resolution No. 395/NK dated 21 October 2020 “On Approval of the Rules for Personal Data Collection and Processing” issued by the Minister for Digital Development, Innovation and Aerospace Industry of the Republic of Kazakhstan
2	Internal
2.1	CPC-K JSC Personal Data Processing and Protection Regulations. Revision 1 (Resolution No. Out-B-CPCK-0163-2017 dd. 30/06/2017)
2.2	Information Security Management Policy STP IB 01/07/2019, Revision No.2 (Resolution No. Out-B-CPCK-0058-2019 of 15/08/2019)

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-K Joint Stock Company

#	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 Labor Code of the Republic of Kazakhstan
1.3	Personal data/PD	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 health insurance 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	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-K in accordance with the CPC-K Personal Data Processing and Protection Regulations
1.7	Cross-border personal data transfer	Transfer of personal data to the territory of foreign states
1.8	Authorized information security management agency	Information Security Committee of the Ministry for Digital Development, Innovations and Aerospace Industry\ of the Republic of Kazakhstan
2	Abbreviations	
2.1	CPC-K JSC CPC-K	Caspian Pipeline Consortium-K Joint Stock Company

5. PROCESS DESCRIPTION

5.1 Caspian Pipeline Consortium- K Joint Stock Company (hereinafter CPC-K) processes personal data as part of its base business operations.

5.2 For the purpose of maintaining its business reputation and complying with Republic of Kazakhstan Law "On Personal Data and Protection Thereof" and associated regulations, CPC- K, in

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the capacity of personal data operator, with relevant rights and obligations, ensures the lawful processing and proper protection of the personal data processed.

5.3 CPC-K processes the personal data on a lawful 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-K ensures their accuracy, sufficiency and, where necessary, relevance with respect to the objectives of personal data processing. CPC-K takes and causes necessary measures to be taken to destroy or update incomplete or inaccurate or excessive personal data.

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

5.6 In the course of its operations, CPC-K may engage a third party to process personal data subject to consent of the personal data owner unless otherwise provided for by the applicable Republic of Kazakhstan 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.

5.7 In the course of its operations, CPC-K may effect a cross-border transfer of personal data to legal entities in foreign countries subject to appropriate personal data protection by such countries and legal entities the personal data are transferred to.

5.8 For the purpose of personal data security during processing thereof, CPC-K takes necessary and sufficient legal, organizational and technical measures to prevent any unauthorized access to the personal data, to timely detect unauthorized access to the personal data, if such unauthorized access could not be prevented, and to mitigate any negative impact from the unauthorized access to the personal data.

5.9 CPC-K protects the personal data from an organizational and technical standpoint in compliance with the Republic of Kazakhstan laws on personal data processing

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

5.10 CPC-K stores the personal data in a database located in the Republic of Kazakhstan.

6. RESPONSIBILITY

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

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 Republic of Kazakhstan.

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

8. LIST OF EXHIBITS

List of exhibits hereto is set out in Table 1.

Table 1. List of Exhibits

Exhibit	Title
1.	Revisions Log

