

	Title Personal Data Processing Policy of GAZPROM INTERNATIONAL LIMITED ILLC	Reg. No.	69
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1 Scope of Application

The Policy applies to all Employees of GAZPROM INTERNATIONAL LIMITED International Company of Limited Liability Company.

2 Terms and Abbreviations

2.1 Terms and Definitions

Automated Processing of Personal Data	processing of personal data using computer equipment
Blocking Personal Data	suspension of personal data processing (unless processing is necessary to validate personal data)
Personal Data Information System	a set of personal data contained in databases and available for their processing using information technologies and technical means
Information	any information (reports, data) regardless of the form of its presentation
Group Companies	GAZPROM INTERNATIONAL LIMITED ILLC and its subsidiaries, partially or fully, directly or indirectly, controlled by GAZPROM INTERNATIONAL LIMITED ILLC and their separate divisions (branch offices, representative offices and project offices). For the purposes of this definition, "control" means holding, directly or indirectly, of more than 50% (fifty percent) of total interest.
Company	GAZPROM INTERNATIONAL LIMITED International Limited Liability Company
Anonymizing Personal Data	actions resulting in the impossibility to identify personal data as those of a particular personal data subject without the use of additional information
Processing Personal Data	any personal data action (operation) or a combination of actions (operations) performed with or without automation, including collection, recording, systematization, accumulation, storage, validation (update, change), extraction, use, transfer (distribution, provision, access to), anonymization, blocking, deletion, and erasure of personal data
Operator	a state body, a municipal body, a legal entity or an individual who independently or jointly with other persons organize and (or) process personal data, as well as determine the purposes of processing personal data, the scope of personal data to be processed, actions (operations) performed with personal data
Personal Data	any information relating to a directly or indirectly identified or identifiable individual (personal data subject)

Personal data authorized for dissemination by the personal data subject	personal data made accessible to an unlimited number of persons by the personal data subject via a consent to the processing of personal data, authorized by the personal data subject for dissemination in the manner prescribed by the current legislation of the Russian Federation
Corporate Security Unit	a structural unit or employee of the Company, who or whom the Company's management has entrusted with planning, organization and control of the Company's information security provision
Policy	Personal Data Processing Policy of GAZPROM INTERNATIONAL LIMITED International Limited Liability Company.
Provision of Personal Data	actions aimed at disclosing personal data to a certain person or a certain circle of persons
Dissemination of Personal Data	actions aimed at disclosing personal data to an indefinite number of persons
Employee	a natural person employed by the Company
Cross-border Transfer of Personal Data	transfer of personal data to a foreign state, a foreign authority, a foreign natural person or a foreign legal entity
Erasure of Personal Data	actions making it impossible to restore the personal data in the Personal Data Information System and/or as a result of which material carriers of personal data are destroyed
2.2 Abbreviations	
PDIS	Personal Data Information System
GDPR	Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC

3 Regulatory References

Document Code	Document Title
Not applicable	Labor Code of the Russian Federation
Not applicable	Federal Law No. 152-FZ of 27 July 2006 "On Personal Data"
Not applicable	Decree of the President of the Russian Federation No. 188 of 06 March 1997 approving the "list of confidential information"
Not applicable	Decree of the Russian Federation Government No. 687 of 15 September 2008 approving the "Regulations on the Particular Considerations of Non-Automated Processing of Personal Data"
Not applicable	Decree of the Russian Federation Government No. 512 of 06 July 2008 approving the requirements for physical biometric data carriers and technologies to store such data outside personal data information systems
Not applicable	Decree of the Russian Federation Government No. 1119 of 01 November 2012 approving the requirements for the protection of personal data that are processed in personal data information systems

Not applicable	Federal Service for Supervision of Communications, Information Technology and Mass Media (Roskomnadzor) Order No. 996 of 05 September 2013 approving the requirements and methods to anonymize personal data
Not applicable	Federal Service for Technical and Export Control (FSTEC) of Russia Order No. 21 dated 18 February 2013 approving of the scope and content of administrative and technical measures securing personal data that are processed in personal data information systems
Not applicable	Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation)

4 Purpose

4.1 Purpose

- This Policy is developed to meet the requirements of the Constitution of the Russian Federation, personal data laws and regulations of the Russian Federation, as well as GDPR requirements.
- The Policy is an internal normative document that defines the underlying principles, goals, conditions of, and methods for processing personal data, lists of subjects whose personal data are processed in the Company, the Company's functions in the processing of personal data, the rights of personal data subjects, as well as measures to ensure that the Company fulfills the obligations of a personal data operator.
- The provisions of the Policy underpin the development of the Company's regulatory and administrative documents governing the processing of personal data of its employees and other personal data subjects in the Company.

5 Principles relating to processing personal data

- 5.1 Acting as a personal data operator, the Company processes the personal data of the Company's employees and other personal data subjects not employed by the Company.
- 5.2 Personal data are processed in the Company having regard to the fact that the rights and freedoms of the Company's employees and other personal data subjects need to be protected, including the right to privacy, personal and family secrets, based on the following principles:
- 1) Personal data are processed on a legal and equitable basis;
 - 2) The processing of personal data is limited to pursuing specific, predefined, and legitimate purposes;
 - 3) If incompatible with the purposes for which personal data were originally collected, processing such personal data is not allowed;
 - 4) Databases cannot be integrated if they contain personal data processed for incompatible purposes;
 - 5) Processable personal data are only those meeting the purposes of being processed.
 - 6) The content and scope of personal data to be processed meet the stated purposes of processing. Personal data to be processed cannot be redundant in relation to the stated purposes for which they are processed;

- 7) Processing personal data requires such data to be accurate, sufficient, and, if necessary, updated to meet the purposes for which such personal data are processed. The Company takes necessary measures or ensures such measures are taken to delete or validate incomplete or inaccurate personal data;
- 8) Personal data shall be stored in a form that allows identifying the personal data subject for no longer than required by the purposes for which such personal data are processed unless storage times are established by federal law and/or a contract to which the personal data subject is a party or under which they are the beneficiary or guarantor;
- 9) Processed personal data shall be destroyed or anonymized after achieving the objectives for which such personal data are processed or if such objectives need no longer to be achieved, unless otherwise provided by federal law. For cross-border transfers of personal data, the Company shall ensure, prior to doing so, that the foreign state, being the transferee state, properly protects the rights of personal data subjects or that this foreign state is a party to the Council of Europe Convention for the Protection of Individuals with Regard to Automatic Processing of Personal Data; in which case, the Company shall send to Roskomnadzor a note of intent to perform a cross-border transfer of personal data.

6 Purposes for which personal data are processed

6.1 Personal data are processed in the Company to:

- 1) Ensure that the requirements of the Russian Constitution, laws and regulations, the GDPR, as well as the Company's internal normative documents are met;
- 2) Perform functions, exercise powers, and fulfill obligations assigned by Russian law to the Company, including those to disclose personal data to state authorities (the Russian Federation Pension Fund, Social Insurance Fund, Federal Compulsory Medical Insurance Fund, and other authorities);
- 3) Manage employment relations with the Company's employees (by onboarding, training and promoting, providing personal safety and security, monitoring work quantity and quality, and ensuring the property is safe);
- 4) Provide the Company's employees and their families with additional guarantees and compensations, including non-state pensions, voluntary medical insurance, health care, and other social security programs;
- 5) Protect the life, health, or other vital interests of personal data subjects;
- 6) Prepare, sign, perform, and terminate contracts with counterparties;
- 7) Provide access control and internal security at the Company's facilities;
- 8) Provide reference tools to internally manage information about the the Company's activities;
- 9) Enforce court orders and the orders of other bodies or officials enforceable under Russian law;
- 10) Exercise the rights and legitimate interests of the Company in implementing activities stipulated by the internal normative documents of the Company or third parties, or to achieve publicly significant goals;
- 11) For other legitimate purposes.

7 List of subjects whose personal data are processed in the Company

7.1 The Company processes the personal data of the following data subject categories:

- 1) Employees of the Company;
- 2) Employees of the Group Companies;
- 3) Other personal data subjects (to ensure that the processing purposes specified in Section 6 hereof are implemented).

8 List of personal data processed by the Company

- 8.1 The list of personal data processed by the Company is determined in accordance with the legislation of the Russian Federation, the GDPR, and internal normative documents of the Company, meeting the purposes of personal data processing stated in Section 6 hereof.
- 8.2 The Company does not process any special personal data categories related to race, nationality, political views, religious or philosophical beliefs, or intimate life.
- 8.3 Processing of biometric personal data is allowed in the Company only with the written consent of the personal data subject, except as provided for by the legislation of the Russian Federation.
- 8.4 The Company processes personal data authorized by the personal data subject for dissemination based on the personal data subject's consent to dissemination in compliance with the prohibitions and conditions for personal data processing established by the personal data subject.

9 Functions of the Company when processing personal data

9.1 When processing personal data, the Company:

- 1) Takes measures necessary and sufficient to ensure compliance with the requirements of the legislation of the Russian Federation, the GDPR and internal normative documents of the Company regulating personal data processing;
- 2) Takes legal, organizational and technical measures to protect personal data from illegal or accidental access, destruction, modification, blocking, copying, provision, or dissemination, and other illegal actions;
- 3) Appoints a person responsible for personal data processing in the Company;
- 4) Issues internal regulations defining the policy and aspects of personal data processing and protection in the Company;
- 5) Informs the employees of the Company directly involved in processing of personal data of the provisions of the legislation of the Russian Federation and internal normative documents of the Company regulating personal data processing, including personal data protection requirements, and provides related training for these employees;
- 6) Publishes, or otherwise provides unrestricted access to, this Policy;
- 7) Informs personal data subjects or their representatives of the availability of personal data of the respective subjects in due course, makes this personal data available upon request of these personal data subjects or their representatives, unless otherwise provided for by the legislation of the Russian Federation;

- 8) Discontinues processing and destroys personal data in cases stipulated by the legislation of the Russian Federation and the GDPR;
- 9) Performs other actions stipulated by the legislation of the Russian Federation regulating personal data processing and the GDPR.

10 Conditions of personal data processing in the Company

- 10.1 The Company processes personal data with the consent of the personal data subject to the processing of his/her personal data, unless otherwise provided by the legislation of the Russian Federation.
- 10.2 The Company does not disclose or disseminate personal data to third parties without the consent of the personal data subject, unless otherwise provided by the legislation of the Russian Federation.
- 10.3 The Company may assign personal data processing to another person with the consent of the personal data subject and based on an agreement concluded with this person. The agreement must contain a list of actions (operations) with personal data that will be performed by the person processing the personal data, the purpose of processing, the obligation of such a person to observe the personal data confidentiality and ensure the personal data security during its processing, and personal data protection requirements in accordance with Article 19 of the Federal Law "On Personal Data".
- 10.4 For internal information purposes, the Company may create directories, address books and other sources, which may include personal data with the written consent of the personal data subject, unless otherwise provided for by the legislation of the Russian Federation.
- 10.5 Access to personal data processed in the Company is allowed only to employees of the Company occupying positions included in the list of positions of the structural unit of the Company, which are subject to personal data processing, on the basis of the order of the Company.
- 10.6 Personal data of personal data subjects located in the Member States of the European Union is processed in the manner determined by the GDPR, in cases where the criteria for the territorial validity of the GDPR apply to the personal data processing activities of the Company.

11 List of actions with personal data and methods of its processing

- 11.1 The Company collects, records, systematizes, accumulates, stores, clarifies (updates, changes), extracts, uses, transfers (distributes, provides, accesses), depersonalizes, blocks, deletes and destroys personal data.
- 11.2 The Company processes personal data in the following ways:
 - 1) Non-automated personal data processing;
 - 2) Automated personal data processing with or without transfer of received information via information and telecommunication networks;
 - 3) Mixed personal data processing.

12 Rights of personal data subjects

12.1 Personal data subjects have the right to:

- 1) Obtain full information about their personal data processed by the Company;
- 2) Access their personal data, including the right to receive a copy of any record containing their personal data, except as provided by the legislation of the Russian Federation;
- 3) Validate, block, or destroy their personal data, if such personal data are incomplete, outdated, inaccurate, illegally obtained or are not necessary for the stated purpose of processing;
- 4) Withdraw the consent to personal data processing;
- 5) Take measures provided by the legislation of the Russian Federation to protect their rights;
- 6) Appeal against the Company's action or inaction in violation of the requirements of the legislation of the Russian Federation regulating personal data processing to the authorized body for the protection of the rights of personal data subjects or to the court;
- 7) Exercise other rights provided by law.

13 Measures taken by the Company to ensure the fulfillment of the obligations of the operator related to personal data processing

13.1 Measures necessary and sufficient to ensure that the Company fulfills its obligations as an operator under the legislation of the Russian Federation regulating personal data processing include:

- 1) Appoint a person responsible for personal data processing in the Company;
- 2) Adopt internal normative documents and other documents regulating personal data processing and protection;
- 3) Provide training and instructions to employees of the structural units of the Company occupying positions included in the list of positions of the Company, which require personal data processing when filled;
- 4) Obtain consent of the personal data subjects to the processing of personal data, except for cases provided for by the legislation of the Russian Federation;
- 5) Separate personal data processed without the use of automation tools from other information, in particular, by recording it on separate physical personal data storage media, in special sections;
- 6) Ensure separate storage of personal data and its physical storage media, which are processed for different purposes and which contain different categories of personal data;
- 7) Ensure the security of personal data when transferring it via open communication channels;
- 8) Store physical personal data storage media subject to conditions ensuring safety and excluding unauthorized access;
- 9) Exercise internal monitoring of compliance of personal data processing with the Federal Law "On Personal Data" and associated regulations, personal data protection requirements, the Policy, and internal normative documents of the Company;
- 10) Other measures provided for by the legislation of the Russian Federation regulating personal data processing and the EU Regulation.

13.2 Measures to ensure the security of personal data when it is processed in personal data information systems are established in accordance with the internal normative documents of the Company regulating the security of personal data when it is processed in the personal data information systems of the Company.

14 Monitoring of compliance with the legislation of the Russian Federation, the GDPR and internal normative documents regulating personal data processing, including personal data protection requirements

- 14.1 Compliance of the structural units of the Company with the legislation of the Russian Federation, the GDPR and internal normative documents of the Company regulating personal data processing is monitored in order to verify compliance of personal data processing in the structural units of the Company with the legislation of the Russian Federation and internal normative documents of the Company regulating personal data processing, including personal data protection requirements, and measures taken to prevent and detect violations of the legislation of the Russian Federation regulating personal data, to identify possible channels of leakage and unauthorized access to personal data, and to remedy the consequences of such violations.
- 14.2 Compliance of the structural units of the Company with internal normative documents of the Company regulating personal data processing, including personal data protection requirements, is monitored internally by the person responsible for personal data processing in the Company.
- 14.3 The Corporate Security Division shall exercise internal control over Personal Data processing practices making sure they are in compliance with the Federal Law On Personal Data and regulatory legal acts adopted in accordance therewith, Personal Data protection requirements, the Policy, and local normative documents of the Company.
- 14.4 Personal responsibility for compliance with the requirements of the laws of the Russian Federation, and the Company's internal normative documents concerning Personal Data in the Company's structural subdivision, as well as for ensuring confidentiality and security of Personal Data in the Company's structural subdivisions rests with their managers.

15 Risks

- 15.1 At all stages of managing personal data processing activities, it is necessary to apply the risk management system effective the Group Companies. This system shall ensure risk identification and assessment, the introduction of risk minimizing measures, and progress monitoring thereof.

16 Final Provisions

- 16.1 The amendments and additions made in the Policy shall be an integral part of the Policy. The invalidity or unenforceability of one or several clauses hereof arising from changes in the legislation or for other reasons, shall not invalidate or make unenforceable other clauses.