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## 1 Introduction

This document (hereinafter “the Policy”) is the basis for developing in-house regulatory documents stipulating the processes of processing and protecting the processed Personal Data (hereinafter “PD”) at Salym Petroleum Services B.V. Private Limited Company, including its branches (hereinafter “the Company”).

### 1.1 Purpose

This Policy is developed for the purpose of Company’s compliance with the legislation of the Russian Federation; it takes into account the requirements of the Constitution of the Russian Federation, legislative and other regulatory legal acts of the Russian Federation concerning PD processing.

### 1.2 Application area

This Policy contains information on the rights and obligations of the Company and PD subjects, purposes of collection, legal grounds and principles of PD processing at the Company.

### 1.3 Target audience

This Policy is publicly available and shall be posted on the Company’s official website.

## 2 General provisions

The Company shall independently process PD, define purposes of PD processing, the list of PD subject to processing, actions (operations) performed with PD and also, on individual occasions, instruct other persons to process PD.

The Company shall follow the following principles during PD processing:

- the processing is performed on a legal and equitable basis;
- the processing is limited to achieving specific pre-determined purposes;
- the processing incompatible with PD collection purposes is not allowed;
- combining data bases that contain PD whose processing is performed for mutually incompatible purposes is not allowed;
- only PD complying with the purposes of its processing shall be processed;
- the content and volume of processed PD shall correspond to the declared purposes of processing;
- accuracy, sufficiency and, if necessary, currency in relation to PD processing purposes is provided during PD processing.

## 3 Main rights and obligations of the Company and PD subjects

### 3.1 Rights and obligations of PD subjects

PD subjects have the following rights:

free familiarization with their PD except in cases stipulated by Federal Law of July 27, 2006 No. 152-FZ “On personal data”;

receiving information related to their PD processing, specifically including:

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confirmation of the fact of PD processing by the Company;

legal grounds and purposes for PD processing;

goals and methods of PD processing applied by the Company;

name and location of the Company, information about persons (except Company workers) who have access to PD or persons to whom PD may be disclosed based on a contract with the Company or based on the federal law;

processed PD related to the corresponding PD subject and its origin unless another procedure of providing this data is stipulated by the federal law;

terms of PD processing, including storage terms;

procedure of PD subjects' realization of rights provided by the Federal Law "On personal data";

information on cross-border data transfer / lack thereof;

company name or surname, name, patronymic and address of the person processing PD under Company's instructions if the processing is assigned or will be assigned to such a person;

other data stipulated by the legislation of the Russian Federation;

demanding that the Company rectify their PD, block or destroy it, in case PD is incomplete, outdated, inaccurate, illegally obtained or unnecessary for the declared processing purpose, and also taking action to protect their rights as stipulated by the law;

appealing against Company's actions or inaction at the authorized body on protecting the rights of PD subjects or at court;

right to protect their rights and legal interests, including compensation of losses and (or) compensation for moral damages at court.

Subjects whose PD is processed at the Company shall:

communicate authentic information on themselves and provide documents containing PD whose list is stipulated by the legislation of the Russian Federation and Company's local regulatory documents within the scope required for processing purposes;

inform the Company of rectifying (updating, modifying) their PD.

### 3.2 Rights and obligations of Company workers processing PD of PD subjects

Depending on the processing purposes specified in Section 4 hereof, Company workers processing PD have the right to:

receive documents containing PD;

demand that PD subjects rectify the provided PD on time.

Company employees processing PD of PD subjects shall:

process PD obtained according to the procedure stipulated in the effective legislation;

take the required legal, organizational and technical measures to protect PD from unlawful or accidental access to it, PD destruction, modification, blocking, copying, provision, distribution or other unlawful actions in relation to PD;

consider applications from a PD subject (a legal representative of the PD subject or an authorized body on protecting rights of PD subjects) concerning processing of their PD and give motivated responses within no more than 7 (seven) work days from the day of receiving the application (request);

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provide a PD subject (a legal representative of the PD subject) an opportunity of free access to their PD processed at the Company;

take measures to rectify and destroy PD of the PD subject due to their (their legal representative's) application with lawful and justified requirements;

organize operating and archive storage of Company documents containing PD of PD subjects according to legislative requirements of the Russian Federation;

not disclose to third persons and not distribute PD without the consent of the PD subject, unless otherwise stipulated by the federal legislation.

## 4 Purposes and processing of personal data collection

The Company processes PD for the following purposes:

consider CVs and select candidates for employment at Company's vacancies;

create and maintain a talent pool at the Company;

maintain HR files – hire workers, document and organize business travel, document vacations and temporary disability leaves, modify workers' biographical details, transfer workers to new positions, issue certificates and extracts, fire workers, train workers, survey workers, create reporting on workers and fulfillment of obligations stipulated by local regulations and employment contracts; fill in Company workers' personal data files;

provide salary and business cards, calculate and pay or deduct monetary funds to/from workers – salary, bonuses, benefits, compensations, allowances;

provide voluntary medical insurance policies for Company workers and relatives of Company workers, interact with insurance companies on issues of voluntary medical insurance policies;

provide life insurance policies to Company workers, interact with insurance companies on life insurance issues;

create and submit reports to state and supervisory bodies and funds (Federal Tax Service of Russia, Pension Fund of Russia, Rostekhnadzor of the Russian Federation, Prosecutor's Office of the Russian Federation, Social Insurance Fund of the Russian Federation);

enter into, support and terminate independent contractor agreements, calculate and transfer compensations to contractors as per independent contractor agreements;

train physical persons rendering services under an independent contractor agreement, arrange business trips, issue certificates and extracts, provide permits-to-work, conduct surveys;

create and issue powers of attorney to physical persons rendering services under independent contractor agreements;

train contractor workers, organize their work process, provide permits-to-work, conduct surveys;

process data of beneficiaries of the Company workers' life insurance;

check conscientiousness of counterparties and verify authorities of parties acting on behalf of a counterparty (specifically, verify their authority to sign a contract);

receive information on counterparties from external web portals and interact with them within project activity at the stages of tendering proceedings;

enter into, support and terminate contracts with counterparties, interact with counterparties' contact persons;

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interact with contact persons while entering into, supporting, modifying or terminating contracts with counterparties;

procure visas, purchase tickets, organize transportation, book hotels for participants of offsite events;

organize offsite events;

registration of invitations to enter the Russian Federation; migration registration at the place of stay;

give access to the Company's territory, control movements within its territories;

receive and prepare answers to PD subjects' applications, requests and complaints;

fulfill obligations stipulated by the effective legislation of the Russian Federation.

## 5 Legal grounds for PD processing

Legal grounds for PD processing are the combination of regulatory legal acts to perform under which and in accordance to which the Company processes PD, including:

Constitution of the Russian Federation;

Civil Code of the Russian Federation;

Labor Code of the Russian Federation;

Tax Code of the Russian Federation;

Federal Law No. 99-FZ of 04.05.2011 "On licensing individual types of activity";

Federal Law No. 426-FZ of December 28, 2013 "On special assessment of work conditions";

Federal Law of 15.12.2001 No. 167-FZ "On compulsory pension insurance";

Federal Law of April 1, 1996 No. 27-FZ "On individual (personalized) accounting in compulsory pension insurance system";

Federal Law of 24.11.1995 No. 181-FZ "On social security for the disabled in the Russian Federation";

Federal Law of July 27, 2006 No. 149-FZ "On information, information technologies and protection of information";

Federal Law of 07.07.2003 No. 126-FZ "On communication";

Decree of the Government of the Russian Federation of 27.11.2006 No. 719 "On endorsing the Regulation on registration with military authorities";

Decree of the State Statistics Committee of the Russian Federation of 05.01.2004 No. 1 "On approving unified formats of primary accounting documentation on employment and remuneration records";

Federal Law of August 15, 1996 No. 114-FZ "On procedure of entering the Russian Federation and leaving the Russian Federation";

Federal law of 25 July 2002 N 115-FZ "On legal status of foreign citizens in the Russian Federation»;

Federal law of July 18, 2006 N 109-FZ "On migration registration of foreign persons and stateless persons in the Russian Federation»;

Articles of Association and Company's other local regulatory acts;

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other laws and regulations of the Russian Federation and regulatory documents of competent public authorities;

subjects' consent for processing their personal data.

## 6 Procedure and conditions of personal data processing. PD volume and categories

To achieve the goals of PD processing, the Company performs the following operations with PD: collection, recording, systemization, accumulation, storage, rectification (updating, modification), retrieval, use, transfer (provision, access to), anonymization, blocking, deletion, and destruction of PD.

The Company receives processed PD:

directly from PD subjects themselves;

from persons who are not PD subjects;

from publicly available sources of PD.

In all cases stipulated by the legislation of the Russian Federation, the Company organizes the procurement of PD subject's consent for processing their PD in writing or in another way making it possible to confirm the fact of its procurement.

PD is received from a person who is not a PD subject on the following grounds:

to achieve goals stipulated by the legislation of the Russian Federation or to perform and fulfill functions, authorities and obligations conferred on the Company by the legislation of the Russian Federation;

to perform under a contract where the PD subject is a party or a beneficiary and also to enter into a contract following the PD subject's initiative or a contract where the PD subject is going to be a beneficiary or a guarantor;

to realize the Company's or third persons' rights and lawful interests on condition that it does not violate PD subject's rights and freedoms;

processing PD access to which was granted to an unlimited number of persons by the PD subject or under their request (PD made publicly available by the PD subject);

processing PD subject to publication or mandatory disclosure according to the federal legislation.

The Company processes PD both using automation equipment and without it.

To achieve the declared goals, the Company processes PD of physical persons who entered into an employment contract with the Company (workers), their relatives, fired workers and candidates for employment; physical persons rendering services under an independent contractor agreement; contractors' workers; beneficiaries under life insurance agreements of Company workers; counterparties who are physical persons and individual entrepreneurs; legal and authorized (persons acting under a power of attorney) representatives of counterparties; counterparties' contact persons; participants of offsite events; visitors of Company branches.

The Company does not take actions aimed at disclosing PD to an indefinite number of persons (i.e. does not distribute PD), except in cases of posting name, surname, patronymic and contact information for public access with the corresponding consent of the PD subject.

The Company does not disclose PD or provide it to third parties without the consent of the PD subject procured in a way required by the legislation of the Russian Federation.

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To perform / fulfill functions, authorities and obligations conferred by the legislation of the Russian Federation and also to achieve its statutory purposes and fulfill its contractual obligations the Company provides some of processed PD to:

- Pension Fund of the Russian Federation;
- Social Insurance Fund of the Russian Federation;
- Federal Tax Service of the Russian Federation;
- law enforcement authorities of the Russian Federation (upon request) and other authorized organizations;
- bank organizations;
- insurance companies;
- the organization providing organizational and access control to the Company's territory;
- organizations rendering educational services;
- organizations rendering services on workers' medical examinations arrangement;
- organizations rendering services on procuring tickets and visas and booking hotels;
- organizations rendering services on warehouse storage and shipment of goods from the warehouse;
- courier, transportation and logistics organizations delivering products;
- organizations providing special assessment of work conditions;
- organizations rendering technical support services;
- organizations issuing an invitation to enter the Russian Federation;
- organizations which are carrying out statement on the migration account in the place of stay in the Russian Federation.

The Company has the right to assign PD processing to another person upon PD subject's consent based on the contract signed with such a person. The contract shall include the list of actions (operations) with PD that will be performed by the person processing PD, purposes of such processing, the obligation of such a person to keep PD confidential and ensure PD security during its processing as well as requirements to the protection of processed PD as per art. 19 of Federal Law "On personal data".

The Company does not process special PD categories related to racial and national identity, political views, religious or philosophical beliefs, intimate life as well as PD on criminal records of PD subjects.

The Company processes special categories of PD related to health condition.

The Company does not process biometric PD.

The Company performs cross-border PD transfer to the territory of the Netherlands and Germany, whereas it is mandatory to make sure that the legal grounds required for this exist, as stipulated by article 12 of Federal Law of 27.07.2006 No. 152-FZ "On personal data".

Information data bases used at the Company for the purpose of collecting PD of citizens of the Russian Federation are located within the RF territory.

The Company does not make decisions triggering legal consequences in relation to PD subject or otherwise impacting their rights and legal interests based on exclusively automated PD processing.

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## 7 Storage of information

PD is not processed at the Company longer than required by PD processing purposes.

Personal data processed at the Company without using automation equipment is stored separately from other information.

The Company organizes PD storage during the time stipulated by the requirements of Federal Law of 22.10.2004 No. 125-FZ “On archive keeping in the Russian Federation” and “List of standard management archive documents generated during the operations of state authorities, local self-governance bodies and organizations, specifying storage time” (Appendix to Order of the Ministry of Culture of the Russian Federation of 25.08.2010 No. 558) and also, on individual occasions, during the time stipulated by the contract whose party, beneficiary or guarantor is the PD subject.

Processed PD is destroyed after PD processing purposes are achieved, in cases when the need to achieve these purposes is no longer relevant, upon expiration of PD storage term.

## 8 Procedure of interaction with PD subjects. Updating, correcting, deleting and destroying PD

Data specified in part 7, article 14 of Federal Law “On personal data” is provided to a PD subject or their representative by the Company in case of a personal application or upon receiving a request from the PD subject or their representative.

The data is provided in the available format and does not include PD related to other PD subjects, except in cases when there are legal grounds for disclosure of such PD.

If the PD subject’s application (request) does not include all necessary information according to requirements of Federal Law “On personal data” or the subject does not have access rights to the requested information, a motivated refusal is sent to them.

The request must contain surname, name and patronymic as well as the number of PD subject’s or their representative’s main ID, information on this document’s date of issue and the body issuing it, information confirming the PD subject’s relations with the Company (contract number, date of entering into contract, conventional verbal designation and (or) other information) or information otherwise confirming the fact of personal data processing by the Company, and PD subject’s or their representative’s signature. The request may be sent as an electronic document and signed with an electronic signature according to the legislation of the Russian Federation.

PD subject’s right of access to their PD may be limited according to part 8, article 14 of Federal Law “On personal data”, specifically, if PD subject’s access to their personal data violates rights and legal interests of third parties.

A response to the subject’s Request on requested data or a notification on the existence of legal grounds to refuse to provide the requested data is sent to the subject within 30 (thirty) days from the day of receiving the PD subject’s request or application.

The Company shall introduce the necessary changes within no more than 7 (seven) work days from the day the PD subject or their representative provides information confirming that PD is incomplete, inaccurate or outdated.

The Company shall destroy PD within no more than 7 (seven) work days from the day the PD subject or their representative provides information confirming that this PD was illegally obtained or is not necessary for the declared processing purpose.

The Company shall notify PD subject or their representative on changes introduced and actions taken, and take reasonable measures to notify third parties to whom this subject’s PD was transferred.



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The Company must report the required information to the authorized body on protection of PD subjects' rights, following this body's request, within 30 (thirty) days from the day of receiving such a request.

Forms of requests (applications) by PD subjects and their representatives are provided in Appendices 1 – 6 hereto.

PD subject may withdraw the consent for PD processing.

In case of PD subject's withdrawal of consent for processing their PD, the Company shall discontinue its processing or make sure that such processing is discontinued (if PD is processed by another person acting on Company's instruction) and, in case PD preservation is not required for PD processing purposes, shall destroy PD or make sure it is destroyed (if PD is processed by another person acting on Company's instruction) within no more than 30 (thirty) days from the day of receiving such a withdrawal, unless otherwise stipulated by the contract whose party, beneficiary or guarantor is PD subject, another agreement between the Company and the PD subject, or in case the Company does not have the right to process PD without PD subject's consent on the grounds stipulated by Federal Law "On personal data" or other federal laws.

Should it prove impossible to destroy PD within the abovementioned time, the Company shall block such PD or make sure it is blocked (if PD is processed by another person acting on the Company's instruction) and makes sure PD is destroyed within no longer than 6 (six) months, unless another term is stipulated by federal laws.

If the PD subject withdraws their consent for PD processing, the Company has the right to continue PD processing without PD subject's consent upon the existence of grounds specified in part 2, article 9 of Federal Law "On personal data".

## 9 Protection of information

The Company takes the necessary legal, organizational and technical measures to protect processed PD from unauthorized or accidental access to it, PD destruction, modification, blocking, copying, provision, distribution or other unlawful actions in relation to PD.

The Company shall issue orders to appoint persons responsible for organization of PD processing and assurance of PD security; a work committee on PD protection is operable.

The Company has identified the list of persons who require access to PD processed in the information systems to perform their job (work) duties.

The Company implements activities to keep track of and ensure security of PD storage media.

The Company performs assessment of harm that can be caused to PD subjects and regularly analyzes conditions and factors creating PD security threats during their processing.

In cases stipulated by the legislation of the Russian Federation, the Company applies, within the PD protection system, information protection means that have passed the compliance assessment procedure according to the established protocol.

New PD information systems are only commissioned after procedures for assessing the efficiency of measures taken to ensure PD security.

Within the PD protection system, the Company has implemented:

- physical protection of premises where the hardware of PD information systems is located;
- application of the required software and software/hardware protection means, specifically, means of protection from unauthorized access, means of access privileges and registration of PD users' actions, anti-virus protection means, level of protection analysis, intrusion detection, backup copying, and firewalls for interactions with the Internet;

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organizational measures providing PD security, adopted and approved by the Company's Management Team, specifically, procedures have been implemented to establish PD access rules, register and keep track of actions performed with PD, the procedure of restoring PD modified or deleted due to unauthorized access to it, keeping track of hardware PD storage media, procedure of workers' training and awareness raising on PD security assurance, control procedures for measures taken on PD security assurance and level of PD protection.

## 10 Disclosure of Information

On behalf of the Company, a Notification on PD Processing was submitted to the authorized body for protection of PD subjects' rights.

To provide unlimited access to Company's policy concerning PD processing and information on the implemented measures for PD protection, the text of this Policy shall be published on the Company's official website.

PD subjects' rights are realized by complying with requests received by the Company from physical persons at the following address:

Mailing address: Tyumen Oblast, Nefteyugansk District, Salym, 15 Yubileynaya Str.;

Email: [info@salympetroleum.ru](mailto:info@salympetroleum.ru)

## Appendix 1 Request form for a subject of personal data to get access to their personal data

I, \_\_\_\_\_

(surname, name, patronymic of the subject)

Passport number: \_\_\_\_\_ date of issue \_\_\_\_\_

Issued by: \_\_\_\_\_

Information confirming that the subject of personal data has / had relations with Salym Petroleum Services B.V. Private Limited Company or information otherwise confirming the fact of personal subject's data processing at Salym Petroleum Services B.V. Private Limited Company:

\_\_\_\_\_

(contract number, contract date)

\_\_\_\_\_

(conventional verbal designation and (or) other information)

hereby request the following information on my personal data processing performed at Salym Petroleum Services B.V. Private Limited Company:

- confirmation of the fact of personal data processing;
- legal grounds and purposes of personal data processing;
- purposes and applied methods of personal data processing;
- location of Salym Petroleum Services B.V. Private Limited Company, information on persons (except workers of Salym Petroleum Services B.V. Private Limited Company) who have access to personal data or to whom personal data may be disclosed based on a contract with Salym Petroleum Services B.V. Private Limited Company or based on federal legislation;
- processed personal data and its origin;
- terms of personal data processing including storage terms;
- procedure of realization of personal data subject's rights stipulated by Federal Law No. 152-FZ "On personal data";
- information on performed or proposed cross-border data transfer;
- company name or surname, name, patronymic and address of the person processing personal data under the instruction of Salym Petroleum Services B.V. Private Limited Company if processing is assigned or will be assigned to such a person;
- other information stipulated by Federal Law No. 152-FZ "On personal data" or other federal laws, specifically:

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Please send your response to the following address:

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Date: \_\_\_\_\_  
Signature: \_\_\_\_\_

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## Appendix 2 Request form for a representative of the personal data subject to get access to personal data

I, \_\_\_\_\_  
(surname, name, patronymic of subject's representative)

Passport number: \_\_\_\_\_ date of issue \_\_\_\_\_

Issued by: \_\_\_\_\_

Acting under \_\_\_\_\_

(name and number of the document confirming the legitimacy of representing subject's rights)

hereby request to provide the following information on processing the personal data of

\_\_\_\_\_ (surname, name, patronymic of the subject)

Passport number of the subject: \_\_\_\_\_ date of issue \_\_\_\_\_

Issued by: \_\_\_\_\_

Information confirming that the subject of personal data has / had relations with Salym Petroleum Services B.V. Private Limited Company or information otherwise confirming the fact of personal subject's data processing at Salym Petroleum Services B.V. Private Limited Company:

\_\_\_\_\_ (contract number, contract date)

\_\_\_\_\_ (conventional verbal designation and (or) other information)

at Salym Petroleum Services B.V. Private Limited Company:

- confirmation of the fact of personal data processing;
- legal grounds and purposes of personal data processing;
- purposes and applied methods of personal data processing;
- location of Salym Petroleum Services B.V. Private Limited Company, information on persons (except workers of Salym Petroleum Services B.V. Private Limited Company) who have access to personal data or to whom personal data may be disclosed based on a contract with Salym Petroleum Services B.V. Private Limited Company or based on federal legislation;
- processed personal data and its origin;
- terms of personal data processing including storage terms;
- procedure of realization of personal data subject's rights stipulated by Federal Law No. 152-FZ "On personal data";
- information on performed or proposed cross-border data transfer;
- company name or surname, name, patronymic and address of the person processing personal data under the instruction of Salym Petroleum Services B.V. Private Limited Company if processing is assigned or will be assigned to such a person;
- other data stipulated by Federal Law No. 152-FZ "On personal data" or other federal laws, specifically:

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Please send your response to the following address:

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Date: \_\_\_\_\_

Signature: \_\_\_\_\_

### Appendix 3 Request form for a subject of personal data to rectify, block or destroy their personal data

I, \_\_\_\_\_

(surname, name, patronymic of the subject)

Passport number: \_\_\_\_\_ date of issue \_\_\_\_\_

Issued by: \_\_\_\_\_

Information confirming that the subject of personal data has / had relations with Salym Petroleum Services B.V. Private Limited Company or information otherwise confirming the fact of personal subject's data processing at Salym Petroleum Services B.V. Private Limited Company:

\_\_\_\_\_  
(surname, name, patronymic of the subject)

\_\_\_\_\_  
(conventional verbal designation and (or) other information)

hereby request to (rectify, block, destroy) the following personal data of mine  
*(please underline)*

processed at Salym Petroleum Services B.V. Private Limited Company:

\_\_\_\_\_  
\_\_\_\_\_

(list of rectified, blocked or destroyed data)

due to the fact that it is

- incomplete;
- outdated;
- inaccurate;
- illegally obtained;
- not necessary for the declared processing purpose.

Blocking data is requested (filled in only if requested to block processed personal data):


- until rectification;
- until destruction.

Please use the following information for rectification (filled in only if requested to rectify processed personal data):

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Please send your response to the following address:

\_\_\_\_\_  
\_\_\_\_\_

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Date: \_\_\_\_\_

Signature: \_\_\_\_\_



## Appendix 4 Request form for a representative of the personal data subject to rectify, block or destroy personal data

I, \_\_\_\_\_  
(surname, name, patronymic of subject's representative)

Passport number: \_\_\_\_\_ date of issue \_\_\_\_\_

Issued by: \_\_\_\_\_

Acting under \_\_\_\_\_

(name and number of the document confirming the legitimacy of representing subject's rights)

hereby request to (rectify, block, destroy) the following personal data

*(please underline)*

\_\_\_\_\_  
(surname, name, patronymic of the subject)

Passport number of the subject: \_\_\_\_\_ date of issue \_\_\_\_\_

Issued by: \_\_\_\_\_

Information confirming that the subject of personal data has / had relations with Salym Petroleum Services B.V. Private Limited Company or information otherwise confirming the fact of personal subject's data processing at Salym Petroleum Services B.V. Private Limited Company:

\_\_\_\_\_  
(contract number, contract date)

\_\_\_\_\_  
(conventional verbal designation and (or) other information)

processed at Salym Petroleum Services B.V. Private Limited Company:

\_\_\_\_\_  
\_\_\_\_\_

(list of rectified, blocked or destroyed data)

due to the fact that it is

- incomplete;
- outdated;
- inaccurate;
- illegally obtained;
- not necessary for the declared processing purpose.

Blocking data is requested (filled in only if requested to block processed personal data):

- until rectification;
- until destruction.

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Please use the following information for rectification (filled in only if requested to rectify processed personal data):

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Please send your response to the following address:

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Date: \_\_\_\_\_

Signature: \_\_\_\_\_

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## Appendix 5 Request form for a subject of personal data to withdraw their consent for personal data processing

I, \_\_\_\_\_

(surname, name, patronymic of the subject)

Passport number: \_\_\_\_\_ date of issue \_\_\_\_\_

Issued by: \_\_\_\_\_

Information confirming that the subject of personal data has / had relations with Salym Petroleum Services B.V. Private Limited Company or information otherwise confirming the fact of personal subject's data processing at Salym Petroleum Services B.V. Private Limited Company:

\_\_\_\_\_  
(contract number, contract date)

\_\_\_\_\_  
(conventional verbal designation and (or) other information)

hereby withdraw my consent for processing personal data

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

(list of personal data in relation to which the consent is withdrawn)

I therefore request that the processing of the specified personal data is discontinued and that the data is destroyed within the terms stipulated by Federal Law No. 152-FZ "On personal data".

Please send your response to the following address:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Date: \_\_\_\_\_

Signature: \_\_\_\_\_

## Appendix 6 Request form for a representative of the subject of personal data to withdraw the consent for personal data processing

I, \_\_\_\_\_  
(surname, name, patronymic of subject's representative)

Passport number: \_\_\_\_\_ date of issue \_\_\_\_\_

Issued by: \_\_\_\_\_

Acting under \_\_\_\_\_

(name and number of the document confirming the legitimacy of representing subject's rights)

Hereby withdraw the consent for processing personal data of

\_\_\_\_\_  
(surname, name, patronymic of the subject)

Passport number of the subject: \_\_\_\_\_ date of issue \_\_\_\_\_

Issued by: \_\_\_\_\_

Information confirming that the subject of personal data has / had relations with Salym Petroleum Services B.V. Private Limited Company or information otherwise confirming the fact of personal subject's data processing at Salym Petroleum Services B.V. Private Limited Company:

\_\_\_\_\_  
(contract number, contract date)

\_\_\_\_\_  
(conventional verbal designation and (or) other information)

processed at Salym Petroleum Services B.V. Private Limited Company:

\_\_\_\_\_

\_\_\_\_\_  
(list of personal data in relation to which the consent is withdrawn)

I therefore request that the processing of the specified personal data is discontinued and that the data is destroyed within the terms stipulated by Federal Law No. 152-FZ "On personal data".

Please send your response to the following address:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_.

Date: \_\_\_\_\_

Signature: \_\_\_\_\_

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## Appendix 7 Corporate glossary elements used herein

### App. 7.1 Regulatory references

The following external laws and regulations are referenced in this document:

Constitution of the Russian Federation;

Civil Code of the Russian Federation;

Labor Code of the Russian Federation;

Tax Code of the Russian Federation;

Federal Law No. 99-FZ of 04.05.2011 “On licensing individual types of activity”;

Federal Law No. 426-FZ of December 28, 2013 “On special assessment of work conditions”;

Federal Law of 15.12.2001 No. 167-FZ “On compulsory pension insurance”;

Federal Law of April 1, 1996 No. 27-FZ “On individual (personified) accounting in compulsory pension insurance system”;

Federal Law of 24.11.1995 No. 181-FZ “On social security for the disabled in the Russian Federation”;

Federal Law of July 27, 2006 No. 149-FZ “On information, information technologies and protection of information”;

Federal Law of 07.07.2003 No. 126-FZ “On communication”;

Decree of the Government of the Russian Federation of 27.11.2006 No. 719 “On endorsing the Regulation on registration with military authorities”;

Decree of the State Statistics Committee of the Russian Federation of 05.01.2004 No. 1 “On approving unified formats of primary accounting documentation on employment and remuneration records”;

Federal Law of August 15, 1996 No. 114-FZ “On procedure of entering the Russian Federation and leaving the Russian Federation”;

### App. 7.2 Terms and definitions

The below terms and definitions shall be used herein.

**Security of personal data** – condition of personal data security from unlawful activities characterized by the ability of users, technical means and the information system to provide confidentiality, integrity and availability of personal data during its processing regardless of its presentation format.

**Malware** – software designed for unauthorized access to and (or) impact on personal data or resources of a personal data information system.

**Access to information** – capability of retrieving and storing information.

**Availability of personal data** – capability to get unimpeded authorized access to personal data.

**Protection of information** – activity aimed at preventing the leak of protected data and unauthorized and unintended impacts on protected data.

**Personal data information system** – combination of personal data contained in data bases and information technologies and technical means enabling its processing.

**Personal data security incident** – any unforeseen or undesired event that violates (or may violate) the security of personal data.

**Controlled area** – space (territory, building, part of building, room) where uncontrolled presence of strangers is excluded.

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**Confidential information** – information access to which is limited according to the effective legislation of the Russian Federation and other regulatory documents.

**Confidentiality of personal data** – the requirement not to disclose personal data to third persons and not to allow its disclosure without consent of the PD subject or another legal justification that the operator or another person receiving access to personal data must comply with.

**Firewall** – local (single component) or functionally distributed software (hardware & software) / complex implementing control over information arriving into the personal data information system and (or) leaving the information system.

**Unauthorized access** (unauthorized actions) – access to information or actions with information violating the rules of access privileges using in-built tools provided by PD information systems.

**Processing of personal data** – any action (operation) or combination of actions (operations) performed with personal data using automation equipment or without using such equipment, including collection, recording, systematization, accumulation, storage, rectification (updating, modification), retrieval, usage, transfer (distribution, provision, access to), anonymization, blocking, deletion, and destruction of personal data.

**Volume of processed personal data** – number of PD subjects whose data is processed at the Company, in the information system or the data base.

**Personal data** – any information related to a directly or indirectly defined or definable physical person (subject of personal data).

**User of personal data** – a person participating in the process(es) of PD processing or using the results of such processing.

**Process of personal data processing** – Company’s business process within which personal data is processed.

**Means of computer technology** – combination of software and hardware elements of data processing systems capable to function independently or within other systems.

**Means of information protection** – hardware, software, hardware and software, substance and (or) material designed or used for protection of information.

**Threat to personal data security** – combination of conditions and factors creating a threat of unauthorized, including accidental access to personal data that may result in destruction, modification, blocking, copying, distribution of personal data as well as other unauthorized activities during its processing in the personal data information system.

**Destruction of personal data** – actions that make it impossible to restore the content of personal data in the personal data information system and (or) resulting in destruction of personal data material storage media.

**Integrity of personal data** – capability of means of computer technology and the information system to provide the invariability of personal data under conditions of its accidental and/or intentional distortion (destruction).

### App. 7.3 Abbreviations

The following abbreviations are used in this document:

Abbreviation	Meaning
AWP	Automated Work Place
	Information Security
	Information System
PDIS	Personal Data Information System

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<b>IT</b>	<b>Information Technologies</b>
<b>LAN</b>	<b>Local Area Network</b>
<b>UAA</b>	<b>Unauthorized Access</b>
<b>OS</b>	<b>Operating System</b>
<b>PD</b>	<b>Personal Data</b>
	<b>Software</b>
<b>RF</b>	<b>Russian Federation</b>
	<b>Means of Computer Technology</b>
<b>MIP</b>	<b>Means of Information Protection</b>
<b>PDPS</b>	<b>Personal Data Protection System</b>
<b>MCIP</b>	<b>Means of Cryptographic Information Protection</b>
<b>AMCS</b>	<b>Access Monitoring &amp; Control System</b>
<b>SPD</b>	<b>Salym Petroleum Services B.V. Private Limited Company including its branch</b>
<b>SPS</b>	<b>Salym Petroleum Services B.V. Private Limited Company including its branches</b>
<b>PDST</b>	<b>Personal Data Security Threat</b>