



"НЕФТЬ - АКТИВ" О.О.О.
ЮРИДИЧЕСКИЙ АДРЕС:
№.: 3/1, БЕГОВАЯ УЛИЦА,
МОСКВА Г., 125284, РОССИЯ.

ФИЗИЧЕСКИЙ АДРЕС:
№ 15, №: 1-Й
КРАСНОГВАРДЕЙСКИЙ
ПРОСПЕКТ, МОСКВА, 123317,
РОССИЯ

РЕГИСТРАЦИОННЫЕ НОМЕРА:
ОГРН: 1077746098495
ИНН: 7725594298
КПП: 71401001

АКТИВ Д" Т.О.О.
ЮРИДИЧЕСКИЙ АДРЕС:
№ 52 АУЭЗОВА УЛИЦА,
АКСУ Г., ПАВЛОДАРСКАЯ
ОБЛАСТЬ, КАЗАХСТАН.

ФИЗИЧЕСКИЙ АДРЕС:
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КАЗАХСТАН.

РЕГИСТРАЦИОННЫЕ НОМЕРА:
БИН: 130240033356
РНН: 451400213225
ОКПО: 51953411

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PERSONAL DATA

PROCESSING

AND

PROTECTION POLICY

OF

"NEFT-ACTIVE" L.L.C.

AND

"ACTIVE-D" L.L.C

February 2023



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1. General provisions

1.1 This document defines the policy of "NEFT-AKTIV" L.L.C. and "ACTIVE-D" L.L.C. (hereinafter - the Policy) regarding the personal data processing.

1.2 The policy is developed in accordance with the Constitution and international agreements of the Russian Federation, the Federal Law No. 152-FZ of 27.07.2006 "On Personal Data", the current legislation of the Russian Federation and other normative documents regulating legal relations in the field of personal data processing and protection, the Company's local regulations.

1.3 The validity of this Policy applies to all processes for collecting, recording, ensuring confidentiality, and protecting, organizing, storing, clarifying, retrieving, using, transmitting (distributing, providing, accessing), impersonating, blocking, removing, deleting the personal data carried out using automation facilities and without using such facilities.

2. Terms and definitions

Personal data (hereinafter referred to as PD):

any information related to a particular individual (PD entity) determined or based on such information, including his surname, name, patronymic, year, month, date and place of birth, address, family, social, property status, education, profession, income, other information.

Automated PD processing:

PD processing using computer aids.

PD protection:

a set of technical, organizational and technical measures aimed at ensuring the PD safety and protecting information related to a specific PD entity or PD entity determined on the basis of such information.

PD information system:

a system that is a collection of PDs contained in a database, as well as information technologies and technical means that allow processing such PDs using automation facilities or without using such facilities.

PD confidentiality:

the requirement not to disclose PD to third parties and their distribution without the consent of the PD entity or on other legal basis, mandatory for the operator or other person who has access to the PD to comply with.

PD impersonation: actions that make it impossible to determine the PD's identity to a specific subject without using additional information.



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PD processing:

any action (operation) or set of actions (operations) performed using automation facilities or without using such facilities with PD, including collection, recording, systematization, accumulation, storage, updating (updating, modification), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, removal, deletion, destruction of PD.

PD distribution:

actions aimed at disclosing PD to an undefined circle of persons.

Employee:

a person in labor relations with "NEFT-ACTIVE" L.L.C. and "ACTIVE-D" L.L.C. (hereinafter - the Company).

PD entity:

an individual whose PD are processed by the Company in accordance with the provisions of the applicable regulations of the Russian Federation and local regulations of the Company.

Transboundary PD transfer:

PD transfer to the territory of a foreign state to the authority of a foreign state, to a foreign individual or to a foreign legal entity.

PD destruction:

actions that make it impossible to recover the PD content in the PD information system and (or) as a result of which the PD media are destroyed.

3. PD processing principles

When processing PD, the Company adheres to the following principles:

3.1 legality and fair basis; 3.2 limited PD processing by achieving specific, predefined and legitimate purposes; 3.3 preventing the pooling of databases containing PD, processing of which is carried out for purposes inconsistent with each other; 3.4 conformity of the content and volume of PD processed to the stated processing objectives; 3.5 preventing PD processing that is incompatible or redundant with respect to the stated PD processing objectives;

3.6 destroying or depersonalizing the PD upon reaching the objectives of their processing, or in the event of a loss of the need to achieve these goals, if the PD storage period is not established by a federal law, an agreement, under which the PD entity is the beneficiary or guarantor, to which it is a party.



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4. PD processing objectives

PD are processed in the Company for the purposes of:

4.1 protection of life, health or other important interests of PD entities

4.2 conclusion, execution and termination of civil law contracts with individuals, legal entities, individual entrepreneurs and other persons, in cases provided for by the current legislation and the Company's Charter;

4.3 organization of personnel records, ensuring compliance with laws and other regulatory legal acts, signing and executing obligations under labor and civil law contracts;

4.4 managing personnel records, assisting employees in employment, training and personnel transfer within the staffing table, using various types of benefits, meeting the requirements of tax legislation in connection with the calculation and payment of personal income tax, as well as unified social tax, pension legislation in the formation and the presentation of personalized data on each recipient of income taken into account when calculating insurance premiums for compulsory pension insurance and security, filling of the primary statistical documentation, in accordance with the Labour and Tax codes of the Russian Federation, federal laws;

4.5 implementation of the access control regime in the Company, ensuring the safety of property; 4.6 disclosure of information on management bodies, maintenance of the necessary corporate and shareholder documentation in accordance with the current legislation of the Russian Federation; 4.7 formation of reference materials for internal information support of the Company, its branches, companies that are part of the corporate structure of the Company, interdependent legal entities; 4.8 execution of judicial acts, acts of other bodies or officials subject to enforcement in accordance with the legislation of the Russian Federation; 4.9 other actions that do not contradict the current legislation of the Russian Federation.

5. PD processing procedure and conditions

5.1 PD shall be processed in the Company only if one or more of the following conditions exist:

5.1.1 PD shall be processed with the consent of the subject PD to his PD processing; 5.1.2 PD processing is required to achieve the objectives stipulated by international treaties of the Russian Federation or laws for the implementation and performance of functions, powers and duties imposed by the legislation of the Russian Federation on the operator;



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5.1.3 PD processing is required for the administration of justice, execution of a judicial act, an act of another body or official subject to enforcement in accordance with the legislation of the Russian Federation;

5.1.4 PD processing is required to provide state or municipal services in accordance with Federal Law No. 210-FZ of 27.07.2010 "On Organizing Provision of State and Municipal Services" to ensure the provision of such a service for the registration of a PD entity on a unified portal of state and municipal services;

5.1.5 PD processing is required for the performance of a contract under which the PD entity is the beneficiary or guarantor, to which it is a party, as well as for the conclusion of the contract on the initiative of the PD entity or the contract under which the PD entity will be the beneficiary or guarantor;

5.1.6 PD processing is required to protect the life, health or other vital interests of the subject PD, if obtaining the consent of the subject PD is impossible;

5.1.7 PD processing is required for exercising the rights and legitimate interests of the operator or third parties, or for the achievement of socially significant purposes, provided that the rights and freedoms of the PD entity are not thereby violated;

5.1.8 PD processing is required for the professional activities of a journalist and (or) the legitimate activity of a mass media or scientific, literary or other creative activity, provided that the rights and legitimate interests of the PD entity are not thereby violated;

5.1.9 PD processing is carried out for statistical or other research purposes, subject to obligatory depersonalization of PD. The exception is PD processing in order to promote goods, works, services on the market by making direct contacts with the potential consumer by means of communications, as well as for political agitation;

5.1.10 processing of PD, access to which is provided by the PD entity to an unlimited circle of persons, or at its request (hereinafter referred to as PD made public by the PD entity; 5.1.11 processing of PD, subject to publication or mandatory disclosure in accordance with federal law.

5.2. PD processing shall be subject to the consent in writing of the PD entity in the following cases (with the exception of those specifically specified in Federal Law No. 152-FZ of 27.07.2006 "On Personal Data"):

5.2.1 inclusion of the PD entity in public sources of PD;



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5.2.2 processing of special PD categories relating to race, nationality, political views, religious or philosophical beliefs, health status, intimate life;

5.2.3 processing of biometric PD (information that characterizes the physiological and biological characteristics of a person, on the basis of which it is possible to establish his identity and which are used by the operator to identify the PD entity);

5.2.4 transboundary transfer of PD in the territory of foreign states that do not adequately protect the rights of PD entities;

5.2.5 adoption of decisions on the basis of an exclusively automated PD processing that generate legal consequences with respect to the PD entity or otherwise affect its rights and legitimate interests.

5.3. Consent in the form of an electronic document signed in accordance with federal law by an electronic signature is acknowledged as equivalent to the consent in writing on paper with PD entity's handwritten signature

5.4. The Company shall have the right to entrust the PD processing to other person with the consent of the PD entity, unless otherwise provided by the federal law, on the basis of a contract concluded with that person (hereinafter - the operator's instruction). A person carrying out the PD processing on behalf of the Company shall comply with the PD processing principles and rules, provided for by Federal Law No. 152-FZ of 27.07.2006 "On Personal Data".

5.5. If the Company entrusts the PD processing to other person, the Company shall be liable to the PD entity for the actions of this person. The person carrying out the PD processing on behalf of the Company shall be liable to the Company.

5.6. The company and other persons who have access to the PD shall not disclose PD to third parties and not distribute the PD without the consent of the PD entity, unless otherwise provided for by applicable law.

6. Rights and obligations of PD entities

6.1. The PD entity may require from the Company to update its PD, block or destroy it in cases where the PD is incomplete, obsolete, inaccurate, illegally obtained or not necessary for the stated purpose of the processing; take measures provided for by law to protect its rights; request to supplement, correct or delete any incomplete, inaccurate or obsolete PD; to withdraw its consent to the PD processing; appeal against any wrongful acts or omissions by the Company in its PD processing and protection;



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6.2. The PD entity may receive information regarding the processing of its PD, including which contains:

- 6.2.1 confirmation of the fact of PD processing by the Company;
- 6.2.2 legal grounds and objectives for PD processing;
- 6.2.3 objectives and methods of PD processing used by the Company;
- 6.2.4 name and legal address of the Company, information on persons (with the exception of the Company's employees) who have access to the PD or who can be disclosed the PD on the basis of an agreement with the Company or on the basis of Federal Law No. 152-FZ of 27.07.2006 "On Personal Data";
- 6.2.5 Processed PD related to the relevant PD entity, the source of their receipt, unless other procedure for submitting such data is provided for by Federal Law No. 152-FZ of 27.07.2006 "On Personal Data";
- 6.2.6 PD processing time, including the time of their storage;
- 6.2.7 procedure for the PD entity to exercise the rights provided for by Federal Law No. 152-FZ of 27.07.2006 "On Personal Data";
- 6.2.8 information on the previous or anticipated transboundary transfer of the PD;
- 6.2.9 name or surname, name, patronymic and address of the person carrying out the PD processing on behalf of the Company, if the processing is entrusted or will be entrusted to such person;
- 6.2.10 other information provided for by Federal Law No. 152-FZ of 27.07.2006 "On Personal Data" or other regulations.

6.3. PD entities may be liable for providing false information to the Company, as well as for late updating of the provided PD in case of any changes.

7. Rights and obligations of the Company when processing PD

7.1. The Company shall have the right to:

- 7.1.1 obtain documents containing PD;
- 7.1.2 require from PD entity to timely update the PD provided.



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РЕГИСТРАЦИОННЫЕ НОМЕРА:

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ИНН: 7725594298

КПП: 71401001

АКТИВ Д" Т.О.О.

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7.2. The Company shall:

7.2.1 process PD entities subject to the principles and rules provided by the current legislation of the Russian Federation and the Company's internal documents in the field of PD;

7.2.2 provide the PD entity or its legal representative, at its request, information about the availability of the PD in the Company relating to the relevant PD entity;

7.2.3 grant the opportunity for the PD entity or its legal representative to review the PD of the PD entity free of charge upon receipt of the relevant request;

7.2.4 process PD received in accordance with the procedure established by applicable law;

7.2.5 consider the claims of the PD entity (legal representative of the PD entity, authorized body for the protection of the rights of the PD entities) and give reasoned replies within a reasonable period;

7.2.6 grant the PD entity (legal representative of the PD entity) the possibility of free access to its PD processed by the Company;

7.2.7 take measures to clarify, destroy PD of the PD entity in connection with its or its legal representative's request with legitimate and justified requirements;

7.2.8 explain the PD entity the legal consequences of the refusal to provide the PD;

7.2.9 destroy the PD of the PD entity, taking into account the time limits for document storage established by law;

7.2.10 organize the operative and archival storage of Company documents containing PD of the PD entities, in accordance with the requirements of the legislation of the Russian Federation.

8. PD security measures.

8.1. When processing PD, the Company shall take the necessary legal, organizational and technical measures to protect PD from unauthorized or accidental access to them, destruction, modification, blocking, copying, provision, distribution of PD, as well as from other illegal actions against PD.



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8.2. *The PD security shall be achieved by:*

8.2.1 identification of PD security threats when processing them in PD information systems;

8.2.1 protection of PD of PD entities from improper use or loss, ensured by the implementation of a set of organizational and technical measures to ensure their security;

8.2.1 appointment of persons responsible for ensuring the PD security;

8.2.1 use of organizational and technical measures to ensure the PD security when processing them in PD information systems required to meet PD protection requirements, the implementation of which is ensured by the levels of PD security established by the Government of the Russian Federation;

8.2.1 use of procedures to assess the compliance of information protection means in the established manner;

8.2.1 evaluation of the efficiency of the measures taken to ensure the PD security prior to the commissioning of the PD information system;

8.2.1 accounting of the PD machine carriers;

8.2.1 detection of unauthorized access to PD and taking appropriate preventive measures;

8.2.1 restoration of PD, modified or destroyed due to unauthorized access to them;

8.2.1 establishing rules for accessing PD processed in the PD information system, as well as ensuring that all actions performed with the PD in the PD information system are recorded;

8.2.1 control over the measures taken to ensure the PD security and the level of security of PD information systems.

Thank You
Yury Albertovich Slutsky
Deputy Managing Director
February 2023