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Translation from Romanian

Note No. 1 – for EGMS

Measures undertaken across Rompetrol Rafinare S.A. in order to ensure the protection of natural persons' fundamental rights and freedoms (and especially of their right to personal data protection) and to reduce the risks of possible penalties as a result of implementing the EU Regulation 2016/679 as from 25 May 2018.

Taking into account the material changes brought to the applicable legal framework on personal data protection by the entering into force of the EU Regulation 2016/679 (hereinafter referred to as **the Regulation** or **GDPR**) as well as the potential significant negative consequences in case of breaching the obligations provided by the Regulation, the entities of the KMG International Group in Romania (including RRC) are running a complex project to ensure their activities and operations are aligned with the requirements of the Regulation (hereinafter referred to as the **GDPR Project**), until the date of its implementing (i.e. 25 May 2018).

The GDPR Project was initiated in July 2017 by the Compliance and Legal Departments across the KMG International Group and, as from December 2017, it is run with the specialized support of the external consultants of Wolf Theiss (Legal/Compliance) and Oracle Romania (IT) – service providers selected as a result of a competitive process that took place at group level.

The purpose of the GDPR Project fully covers the needs of RRC in terms of compliance to the requirements of the GDPR and addresses directly to the RRC activities and operations who involve personal data processing, regardless of the manner of storage and processing.

The GDPR Project is divided in 2 distinct phases, as follows:

1. The complete assessment phase, in which the current situation is assessed (period: January - April 2018), consisting in:

(i) preliminary analysis (AS IS analysis) of the personal data processing operations presently conducted by RRC (reviewing the internal regulations and relevant policies and procedures, studying all the personal data flows within RRC, mapping such operations, reviewing the contracts/standard documents, assessing the applications and IT infrastructure running in the locations or which are operated by RRC employees, against the new regulations etc.)



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(ii) analysis of the discrepancies between the current situation related to the personal data processing operations performed by RRC and of the Regulation requirements – (the GAP ANALYSIS) including the specific analysis of the (IT) technical operations performed by Oracle Romania;

(iii) Preparation of specific deliverables: assessment report, Privacy Impact Assessment (PIA) for the relevant RRC systems and processes (according to the Regulation and the ANSPDCP Guide), the personal data flow map, the Register of personal data processing activities across RRC (according to the Regulation and the ANSPDCP Guides)

2. The implementing phase (April - May 2018) and the related deliverables:

- (i) Preparation and review of the internal regulations, policies and procedures for compliance with the Regulation requirements (including the future RRC procedure for personal data processing);
- (ii) Preparation and modification of the standard clauses on personal data protection and of related annexes to the contracts in which RRC is a party;
- (iii) Recommendations for implementing the specific instruments to ensure the new rights of natural persons, as per the Regulation;
- (iv) Introducing the *privacy by design* concept (sets of mandatory recommendations)
- (v) Design and implementation for organization and management of personal data protection across RRC;
- (vi) Consultancy for appointment of the Data Protection Officer (DPO) across RRC (if needed);
- (vii) Delivery of the functional requirements which need to be implemented in the IT applications and systems, as identified in the assessment, for compliance with the Regulation requirements;
- (viii) Preparation and delivery of the *Data breach response plan* in case of potential losses, accidental or illegal destructions or transmissions of personal data;
- (ix) Training sessions and personal data protection workshops by key RRC key-users etc.

Until now, the following planned project activities have been accomplished, regarding the assessment of personal data flows in RRC and awareness on the Regulation requirements by the RRC employees:

- Workshop (presentation of GDPR) delivered by Wolf Theiss/Oracle – Assessment and implementing of the GDPR requirements - Bucharest – 22 January 2018;



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- As from 12 January 2018, RRC provided the Wolf Theiss consultants the whole documentation they required, relevant to the project domain;
- From 30 January to 12 February 2018, the RRC functions and departments deemed relevant (the Petromidia and Vega locations) to the GDPR Project received Wolf Theiss questionnaires to assess the current personal data flows, which they completed accordingly;
- From 14 February to 2 March 2018, the Wolf Theiss consultants ran a series of direct interviews with RRC employees selected from the departments relevant to the project purpose (Petromidia and Vega locations), in order to detail and refine the information provided in the initial questionnaires and the preliminary completion of the register, including the registration of the activities involving personal data.

We must add that we are currently in the assessment phase conducted by the Wolf Theiss/Oracle consultants, which proceeded with assessing the requested and obtained information and documentation, as well as with preparation of the deliverables agreed for this project phase. We specify that the project activities are presently conducted according to the initially settled plan, without significant delays or deviations from the agreed purpose and duration.

Considering the purpose of the GDPR Project, the substantial activities undertaken until now as part of the first assessment phase, as well the employment of specialized consultancy on personal data protection, **we believe the process of aligning the RRC activities and operations to the requirements of the EU Regulation 2016/679 is on a normal course (taking into account the complexity of the issue and the significant changes brought by the regulation), which entitles us to assume that RRC will be able to observe the Regulation obligations incumbent on it, and to ensure the natural persons' rights to personal data protection, in accordance with the terms and conditions imposed by the new regulation, as from the date of its implementation (i.e. 25 May 2018).**



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We are available to you for any additional clarifications or explanations related to the process of alignment to the Regulation requirements, on which we will regularly notify you, with specific information on the relevant phases of implementation within RRC.

Yours truly,

Chairman of the Board of Directors,

Cătălin Dumitru

Signature illegible

Group Compliance Manager,

Adrian Balan

Signature illegible