

SAUDI ARABIAN OIL COMPANY (Saudi Aramco)
GENERAL INSTRUCTION MANUAL

ISSUING ORG. Law Organization (LAW)

SUBJECT PERSONAL DATA

G. I. Number **Approved**
1900.001

ISSUE DATE
09/10/2015

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CONTENT:

This General Instruction (GI) defines the controls and procedures required to ensure that Personal Data is collected, processed, safeguarded and exchanged in a manner that is consistent with applicable international law. It includes the following sections:

- 1.0 Proponent
- 2.0 Scope
- 3.0 Definitions
- 4.0 Principles
- 5.0 Collection & Processing Purposes
- 6.0 Collection & Processing Procedures
- 7.0 Affiliates & Third Parties
- 8.0 Roles & Responsibilities

1.0 PROPONENT

- 1.1 Except as otherwise states herein, the Law Organization (LAW) is the proponent of this GI. Further inquiries should be addressed to the General Counsel. Any exception or changes to the procedures in this instruction will require the General Counsel's approval.

2.0 SCOPE

- 2.1 This General Instruction applies to all Personal Data (contractors, secondees, applicants, and employees past and present, *et al.*) collected and processed by, or for the benefit of, Saudi Aramco.
- 2.2 This GI only applies to personal data collected and processed by, or for the benefit of, Saudi Aramco by Saudi Aramco or its Affiliates and does not include data that has been rendered anonymous (where individual persons are no longer identifiable or are identifiable only with a disproportionately large expense in time, cost or labor).

3.0 DEFINITIONS

- 3.1 **Affiliates:** Saudi Aramco wholly owned service companies, Saudi Aramco Joint Venture Organizations and independent third parties who collect and/or process Personal Data for the benefit of Saudi Aramco.
- 3.2 **Data Subject:** The individual who's Personal Data is collected and/or processed by Saudi Aramco.
- 3.3 **Data Controller:** The individual or entity that determines the purposes for which and the manner in which Personal Data will be processed.
- 3.4 **Data Processor:** The individual or entity that Processes Personal Data on behalf of the Data Controller.
- 3.5 **Personal Data:** Any data, or collection of data, relating to an identified, or an identifiable, natural person, or data that can be reasonably linked to a specific computer or other device. An identifiable natural person is a person who can be identified, directly or indirectly, by reference to an identification number (e.g., an employee number, social security number or national identity card number) or factors specific to his or her physical, physiological, mental, economic, financial, cultural or social identity.
- 3.6 **Employee Personal Data:** A category of Personal Data pertaining to current and past Saudi Aramco employees.
- 3.7 **Process or Processing:** Refers to any operation or set of operations that are performed upon Personal Data, whether done by automatic means or otherwise. This includes but is not limited to the collection, recording, organization, storage, updating or modification, retrieval, consultation, use, disclosure by transmission, dissemination or making available in any other form, linking, alignment or combination, blocking, erasure or destruction of Personal Data.

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3.8 **Sensitive Personal Data:** Includes, but is not limited to, Personal Data relating to an individual's racial or ethnic origin, political opinions, religious or political beliefs, sexual orientation, trade-union membership, civil status, health or medical records, social security number, financial accounts including account numbers and personal identification numbers (PINs), or criminal records.

4.0 **PRINCIPLES**

The following Personal Data processing principles shall apply to all Personal Data collected, processed or exchanged by, or for the benefit of, Saudi Aramco.

- 4.1 Personal Data will be Processed lawfully and in accordance with legitimate purposes.
- 4.2 Personal Data will be collected for specified, legitimate purposes in accordance with applicable law and will not be Processed in ways different than the stated purposes.
- 4.3 Personal Data will be relevant to, adequate to, and not excessive for the purposes for which it is collected and used.
- 4.4 Personal Data will be accurate and, where necessary, kept up-to-date. Reasonable steps will be taken to rectify or delete Personal Data that is identified as inaccurate or incomplete.
- 4.5 Personal Data will be kept only as long as it is necessary for the purposes for which it was collected and Processed.
- 4.6 Appropriate technical, physical, and organizational measures will be taken to prevent unauthorized access, unlawful Processing, and unauthorized or accidental loss, destruction, tampering or damage to Personal Data.
- 4.7 Personal Data shall only be exchanged or transferred from the country where it was collected from the Data Subject to another country in compliance with applicable law.

5.0 **LEGITIMATE COLLECTION & PROCESSING PURPOSES**

Saudi Aramco complies with all applicable laws and has implemented stringent measures to act in accordance with all data privacy and protection regulations pertinent to its worldwide operations. Saudi Aramco collects, processes, and exchanges Personal Data only for the legitimate purposes set forth below. All collection, processing and exchange shall be conducted in strict compliance with such legitimate purposes subject to authorized limitations and in accordance with applicable law. The principle purposes include:

- 5.1 **Recruitment, Verification & Relocation:** Recruitment processes are activities to: (1) identify, screen, assess, and select candidates/applicants to be considered for employment by Saudi Aramco; (2) verify the truthfulness of candidate data through submitted and publically available data about the candidate; and (3) relocate candidates into the workforce of the Company. Examples include receiving applications; verifying employment and educational credentials, marital status, criminal background, legal matters in which the candidate was a party, and credit history; sharing data with Company affiliates and communicating with applicants and/or their representatives.
- 5.2 **Human Resources & Personnel Management:** Human resource processes are activities to maintain a workforce for the Company. Examples include delivering pay, managing careers and development, training, administering employee benefits, retaining appropriate records, administering labor agreements, complying with applicable legal requirements, sharing data with Company affiliates and communicating with employees and/or their representatives.
- 5.3 **Business Process Execution & Management:** Business processes are activities to run the operations of the Company. Examples include workforce structuring and restructuring, scheduling work, managing Company assets, running hotlines, populating employee directories, employee training and development, and evaluating employee performance.
- 5.4 **Cyber-Security:** Cyber-security processes are activities to ensure the safety and integrity of all systems connected to the Company network. Cyber-security encompasses three main areas; inward facing activities, outward facing activities and lateral activities. Inward facing activities record and monitor external network activity for the purpose of identifying, predicting, and preventing the entry of malicious activity onto the Company Network. Outward facing activities record and monitor internal network activity to identify, predict and prevent the unauthorized release of Company data from the Company network. Lateral activities record and monitor intra-organizational network activity to identify, predict and prevent unauthorized lateral use of Company data.

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5.5 Government Required Data: Personal Data required by the government of Saudi Arabia for the application, processing and granting of a visa to enter, work and/or reside in Saudi Arabia or other governmental purposes. Such purposes may include verification that the Data Subject understands the necessity of abiding by all the laws and regulations of the Kingdom of Saudi Arabia; respecting the countries Islamic customs and traditions. Examples include obtaining information as to the purpose of travel, work permit, Iqama, religion of the entrant, flight information, duration of stay and point of origin as well as medical and background clearances required to make a Saudi visa application.

If a new process or tool is introduced that will result in the Processing of Personal Data for purposes that exceed the purposes described above, the Saudi Aramco entity responsible for the new process or tool will coordinate with Law to ensure that the concerned employees are informed of the new process or tool, the purposes for which the Personal Data will to be used and the categories of recipients of the Personal Data as may be required by applicable law.

Without prior written approval from the Law, neither Saudi Aramco nor any of its Affiliates may collect process or exchange Personal Data subject to this GI, for any purpose not explicitly stated above.

6.0 COLLECTION & PROCESSING PROCEDURES

All Saudi Aramco operations and Affiliates collecting and/or processing Personal Data subject to this GI, shall be responsible for the following:

6.1 Notice: Providing adequate and transparent notice to Data Subjects of the following:

- The Personal Data being collected from them and the purposes for collecting and processing their Personal Data;
- The Data Subjects rights, under applicable law, to have access to and where appropriate correct and/or modify Personal Data;
- That Personal Data may need to be exchanged, transferred or disclosed to Affiliates and third party service providers for one of more of the legitimate purposes set forth in this GI.
- That some of the parties to whom Personal Data may be exchanged or disclosed may be located in countries whose data protection laws may not be equivalent to their home country.

6.2 Consent: Obtaining explicit Data Subject consent, as required by applicable law, for (1) the collection and processing of Sensitive Personal Data and (2) the exchange or transfer of their Personal Data to a third-party service provider or Saudi Aramco or Affiliate located in a country other than country where the Personal Data was collected.

6.3 Retention: Retaining Personal Data for no longer than is required by the legitimate purposes for which is was collected or otherwise allowed by applicable law.

6.4 Confidentiality & Security: Taking appropriate technical, physical and organizational measures to protect Personal Data and Sensitive Personal Data against unauthorized access, unlawful Processing, accidental loss or damage and unauthorized destruction.

6.5 Exchange of Personal Data

6.5.1 Between Affiliates: Exchange of Personal Data between Saudi Aramco and Affiliates shall be carried out where the applicable legal requirements have been met and if:

- the exchange is based on a clear business need; and
- the receiving party provides appropriate security for the data.

6.5.2 Non-Affiliates:

- **Business Associates:** Third Parties who require Personal Data to perform certain legitimate services on behalf of Saudi Aramco or its Affiliates, may only Process Personal Data (1) under contract or other legally binding

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and permissible means that require appropriate security measures to ensure an adequate level of protection, and (2) in accordance with Saudi Aramco's instructions or to make decisions regarding the data as part of the delivery of their services (e.g., to assess eligibility for a disability benefit).

- *Other Third Parties:* Certain Personal Data may be disclosed to other third parties: (1) where required by law (e.g., to tax and social security authorities or in response to a valid subpoena); (2) to protect the Saudi Aramco or its Affiliates' legal rights (e.g., to defend a litigation suit or pursuant to a government investigation or inquiry); or (3) in an emergency where the health or security of an employee is endangered (e.g., a fire)

7.0 ROLES & RESPONSIBILITIES

7.1 Saudi Aramco

- 7.1.1 Saudi Aramco shall be the Data Controller for Personal Data subject to this GI.
- 7.1.2 Staffing Services Department, Corporate Security Services Division, Information Protection Department and any other applicable business operation that collects and/or processes, stores, utilizes Applicant Data and/or Employee Data, is responsible for ensuring that such collection and processing is done in compliance with this GI.
- 7.1.3 Law Organization will provide legal opinions, advice, training and assistance to Company organizations regarding compliance with applicable laws and regulations including the development of requisite notices, acknowledgment procedures, and other documents. Law will further direct and assist any necessary collaboration occurring between Company organizations and the jurisdictions legal authorities in order for the Company organization to be legally compliant.

7.2 Affiliates

- 7.2.1 ASC, AOC, ABS, JV's and Third Parties shall be responsible for advising Saudi Aramco of all data privacy laws and regulations applicable to the collection, processing and/or exchange of Personal Data (or legally relevant equivalent) for the benefit of Saudi Aramco.
- 7.2.2 Where required by applicable law, the appropriate Saudi Aramco Subsidiary shall register and serve as the local representative (or legally relevant equivalent) for the collection and processing of Personal Data within that jurisdiction.

- 7.3 **Third Parties** – Shall be the Data Processor for all Personal Data processed for the benefit of Saudi Aramco and/or its Affiliates.

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CONCUR:

Administrator Corporate Security Division

Date

CONCUR:

Manager Information Protection Department

Date

CONCUR:

Director Staffing Services Department

Date

CONCUR:

Director Personnel Department

Date

CONCUR:

Director HR Policy & Planning

Date

CONCUR:

VP Materials Supply

Date

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General Counsel

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