

**Subjected to the analysis and information at the BoA meeting of 20.03.2018
and for information in the OGMS of 26.04.2018**
Cyber Security Expert
No. 10245 / 15.03.2018.

DIRECTOR GENERAL
Sr. Eng. Dan- Silviu BACIU, MBA
S.s. illegible

Information Note

**regarding the measures for the personal data
protection within the company CONPET S.A.**

Following the request of the Ministry of Energy from the notification no. 100.931 / AA / 08.03.2018, we bring to your attention the following:

Computer threats in the year 2017

The year 2017 was one in which computer threats were brought to the fore more than ever. WannaCry has been the biggest computer threat lately. More than 250,000 computers have been affected worldwide, including in Romania. This is a fast-paced type of ransomware that blocks usable data and then calls for rewards.

Because of the success of virtual coins, there have been increasingly common methods that use the power of processing infected computers for "virtual currency mining," generating money for attackers. Such attacks can also hide behind a simple view of a web page.

The number of spam mails will increase as well as the number of infected files attached to them.

In addition to attacks on IT networks, the orchestrated attacks against SCADA networks have become more and more dangerous and sophisticated.

One reason to worry is that sites that host malicious software source code may appear, or can automatically generate malware for those who are likely to infect computers.

Statistics of informatic / computer security within CONPET - February 2018

So far, in CONPET we did not have any incidents on the cyber security area, but that does not mean that I'm fast free of various attempts to attack.

Statistics of IT security events in February 2018:

- Out of 126,000 emails received to the corporate addresses, 100,000 were spam and were stopped before they reach users.
- There were up to 7,000 firewall connections (usually scanned after open ports and trying out connection modes to Internet-connected servers)
- 70,000 potentially dangerous sites were blocked
- 68 attempts to inject malicious code were stopped.

Legislation

In 2018, two European regulations will begin to take effect, which may have an impact on information in electronic format and will require additional efforts to protect data:

- Regulation (EU) 2016/679 on the protection of individuals with regard to the processing of personal data and the free movement of such data and repealing Directive 95/46 / EC (**GDPR**)
- DIRECTIVE (EU) 2016/1148 OF THE EUROPEAN PARLIAMENT of 6 July 2016 on measures for a high common level of network and information security in the Union (NIS Directive)

Measures to ensure the protection of personal data in CONPET

Regulation (EU) 2016/679 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and abrogating Directive 95/46 / EC entered into force on 25 May 2016 and will be directly applicable on EU level starting on 25 May 2018.

According to this, economic operators must implement technical and organizational measures to ensure an adequate level of security of personal data processing and to report breaches of data security to the supervisory authority not later than 72 hours after taking knowledge of the breach of that provision.

CONPET has already begun to put into practice the necessary measures to ensure compliance and related requirements as well as to align with good practices in terms of the measures required to protect data:

- A Data Protection Officer - Cyber Security Specialist was appointed, assigned with responsibilities in implementing the necessary measures in this field

- We are in the process of identifying the areas of the organization that own and / or process personal information in order to keep a record of such activities
- We prepare documents to inform people whose personal data are in possession of CONPET.
- We prepare notification forms for competent authorities in case of breaches of data security.
- Instructions will be organized with the personnel to conduct the activity according to GDPR requirements.

Confirmation of IT security level

Both the GDPR and the NIS Directive, in addition to the requirements for enhanced data security, will enable national authorities with competence in both directions (the National Authority for Personal Data Processing Supervision - ANSPDCP and the National Response Center for Cyber Security Incidents - CERT.RO) to request evidence of the effective implementation of security policies, such as the results of a security audit conducted by the competent authority or a qualified auditor.

Discussions with representatives of the two institutions revealed that procedures for accrediting audit service providers are under way.

After completing the implementation of the security measures proposed above, a security audit is required to ensure that CONPET is in compliance with regulatory requirements and best practices in the field of IT security. This audit will make an objective assessment of the company's IT needs as well as suggest viable solutions to eliminate its vulnerabilities.

However, in order to be sure that the results of the audit will be recognized by the competent authorities, it is preferable that this audit be carried out by an accredited auditor.

We hereby enclose the notification of the Ministry of Energy no. 100.931 / AN08.03.2018.

Cyber Security Expert
Eng. Eduard SCARLAT

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No. 9319/09.03.2018

Minister's Cabinet

No. 100931/AA/08.03.2018

Addressed to

Company CONPET S.A.

Director General

Eng. Dan-Silviu Baci, MBA

Attention to: **The Board of Administration** / The Supervisory Council

Regulation (EU) 2016/679 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and abrogating Directive 95/46 / EC (General Regulation on Personal Data Protection) entered into force at May 25, 2016 and will be directly applicable in the European Union as of May 25, 2018.

On the website of the National Authority for the Supervision of Personal Data Processing, the regulation can be accessed at the Internet address:

<http://www.dataprotection.ro/servlet/ViewDocument?id :::1262>

This Regulation adopts strict, carefully detailed obligations on operators and persons designated by the economic operator to be responsible for the protection of personal data.

It should be kept in mind that all economic operators have to implement technical and organizational measures to ensure an adequate level of security of the processing of personal data, referring to the six principles related to the processing of personal data (see Article 5 of the Regulation) and report breaches of data security to the supervisory authority, not later than 72 hours after they acknowledge the breach of the breach.

The violations of the rules laid down in the General Regulation on the protection of personal data entail substantial fines.

In this context, we recommend that you take the necessary steps in order to organize on your entity level an adequate level of security of your personal data processing, appoint a Data Protection Officer to address the issue and prepare adequate internal protection procedures including periodic evaluations of the effectiveness of these measures.

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We request that at a General Meeting of Shareholders convened for a date prior to the date of entry into force of the above-mentioned Regulation, present to shareholders' information about the measures you intend to take at your entity level to ensure the protection rights and fundamental freedoms of individuals and, in particular, their right to personal data protection and to minimize the risk of sanctions.

Sincerely yours,

MINISTER OF ENERGY

Anton ANTON

