

## Privacy policy

### **Important Legal Notice**

This Privacy Policy constitutes part of the Terms of Use of the Oil Portal of Trafigura Argentina S.A. and Petromining S.A. (Puma Argentina), both operators of the “PUMA” brand (both referred to herein as “Trafigura”). All capitalized terms not otherwise defined herein have the meaning assigned to them in the Terms of Use. Trafigura (as defined below) is committed to protecting and respecting your privacy. This Privacy Policy, together with our Oil Portal Terms of Use and any other documents referred to in it, sets out the basis on which any Personal data which Trafigura collects about you, or that you provide to Trafigura, will be processed by us.

For the purposes of applicable data protection and privacy laws, the data controller is Trafigura Limited, company number 02737924, addressed at 14 St. George Street, London W1S 1FE, United Kingdom. Such entity will hereinafter be referred to as “Trafigura”, “we”, “us”. This Policy explains what Personal data we collect, how we may use and manage it and the rights you have in relation to your Personal data. Before you provide us with any Personal data or browse the Oil Portal, you should read through this Privacy Note and Policy (“Policy”) in full and make sure that you are comfortable with our privacy practices.

#### **1. Whose Personal data do we collect?**

Trafigura collects Personal data from a range of individuals in the context of its business activities, including:

- representatives of our suppliers, customers and other business contacts;
- contractors;
- users of our Oil Portal; and
- individuals who contact us by any means.

#### **2. How we collect your Personal data**

We obtain Personal data which you knowingly and voluntarily disclose to us online through the Oil Portal, notably when you:

- visit our Oil Portal and/or complete the KYC clearance process established therein, which entails submitting certain documentation as outlined in the Terms of Use;
- communicate with us via any means, including but not limited to telephone, email and through the use of social networking websites, third party apps or similar technologies, in connection with any use of the Oil Portal.

We may also collect information from third party sources, e.g. relating to your use of other websites which we operate and from related third parties e.g. sub-contractors.

#### **3. Information Trafigura collects from you**

Trafigura collects a range of Personal data from you in a business context. For purposes of the Oil Portal, we will collect: Name and corporate name of the User’s principal, your name, gender, job title, power of attorney, photographic identification, email address, home address, contact details, details of your business and other interests, communications with you (including notes from meetings) and financial and payment information. All the Personal data itemized above is required for the provision

of the Services and the performance of the legal relationship between User and Trafigura by virtue of the Services.

When you use our Oil Portal, we collect certain standard information that is sent by your browser to the Oil Portal, e.g. your IP address, browser type, operating system, language, time zone setting, access times and any referring website addresses.

We may collect and process information that you provide by filling in forms on the Oil Portal, including without limitation information provided as part of a KYS disclosure process.

If you contact us, we may keep a record of that correspondence.

Trafigura may also ask you to complete surveys that we use for research purposes, although you are under no obligation to respond to them.

We may also record details of your visits to the Oil Portal, including any resources that you access.

#### **4. Where We Store Your Personal data**

The data that we collect from you may be transferred to, and stored in, a country other than your own and that such country may have laws that provide a lower level of data protection requirements than your own country. However, whenever we transfer Personal data across borders, we will take legally required steps to ensure that adequate safeguards are in place to protect your personal data and to make sure that it is treated in accordance with this Privacy Policy. By submitting your Personal data, you agree to this potential transfer to a country other than your own.

You acknowledge and understand that the transmission of information via the internet is not completely secure. Although we will take reasonable and appropriate steps to protect your personal data once we have received it, we cannot guarantee the security of your data transmitted to the Oil Portal; any transmission is at your own risk. Once we have received your information, we will use appropriate procedures and security features to try to prevent unauthorised access.

#### **5. Uses made of the information**

We use Personal data held about you in the following ways:

- (i) the provision of the Services;
- (ii) ensuring User has the authority to bind User's principal in connection with the Services;
- (iii) allowing User to access and use of the Oil Portal (including any versions optimized for viewing on a wireless or tablet device), and any interactive features, and/or other services that Trafigura makes available and that post a link to the Oil Portal;
- (iv) to ensure that content from the Oil Portal is presented in the most effective manner for you and for your computer, including carrying out analytics in relation to the use of the Oil Portal;
- (v) to provide you with information that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes;
- (vi) to carry out our obligations arising from any contracts entered into between you and us;
- (vii) to communicate with you and third party contacts;
- (viii) to comply with our legal and regulatory obligations, which may include the disclosure of certain information and/or recordings of telephone conversations to regulatory authorities;

- (ix) for other business-related purposes, including negotiating contracts, managing accounts and records, supporting corporate social responsibility activities, legal, regulatory and internal investigations and debt administration; and/or
- (x) marketing, per Section 9 of this Privacy Policy.

Purposes above, with the exception of purposes (v) and (x), are necessary for the existence of the legal relationship with the User and/or under the Law. User may state disapproval for us to process Personal Data for the purpose identified in item (v) and (x) above, by sending us an email to [enquiries@trafigura.com](mailto:enquiries@trafigura.com), within 5 business days of this Privacy Policy having been made available to User.

## **6. The legal basis for Trafigura processing your Personal data**

In accordance with the purposes for which we collect and use your Personal data, as set out above, the legal basis for Trafigura processing your Personal data will typically be one of the following:

- your consent;
- the performance of a contract that we have in place with you or other individuals;
- Trafigura or our third parties' legitimate business interests; or
- compliance with our legal obligations.

## **7. Disclosure of your Information**

Trafigura may share your Personal data with people within the organisation who have a "need to know" that data for business or legal reasons, e.g. in order to carry out an administrative function such as processing an invoice, or to direct a query that you have submitted to the relevant department within Trafigura.

Because Trafigura operates globally, we may disclose your Personal data to any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the Companies Act 2006. These entities are required to maintain the confidentiality of your data and are restricted from using it for any purpose other than the purposes set out in this Privacy Policy.

We may disclose your Personal data to third parties including the authorities, Trafigura's advisors, suppliers of IT services and third parties engaged by Trafigura for the purpose of providing services requested by you; to protect any intellectual property rights in any materials displayed on or otherwise available from Trafigura's Oil Portal; for the purposes of seeking legal or other professional advice; to respond to a legal request or comply with a legal obligation; and to enforce Trafigura's Oil Portal Terms of Use.

We may also disclose your Personal data to third parties:

- (i) In the event that we sell, merge or buy any business or assets, in which case we may disclose your Personal data to the prospective seller or buyer of such business or assets;
- (ii) If Trafigura or substantially all of its assets are acquired by a third party, in which case Personal data held by it about its customers will be transferred; and
- (iii) In the event that we are required to do so to comply with our regulatory obligations, to regulatory authorities.

The transfers mentioned in numerals (ii) and (iii) above will not require a further consent once this privacy notice has been consented. User will be deemed to have consented tacitly to the transfer mentioned in numerals (i) above if once this Privacy Policy is made available and no objection is expressed.

We may decide to allow our Oil Portal users to share comments, postings, testimonials, or other information. If you choose to submit such information to us, the information that you submit may be available generally to the public. Information that you provide in these areas may be read, collected, and used by others who access them.

Finally, we may share non-personal data with other third parties that are not described above. When we do so we may aggregate or de-identify the information so that a third party would not be likely to link data to you, your computer, or your device. Aggregation means that we combine the non-personal data of numerous people together so that the data does not relate to any one person. De-identify means that we attempt to remove or change certain pieces of information that might be used to link data to a particular person.

## **8. Records retention**

Your Personal data is not kept for longer than is necessary for the purposes for which it is collected. This means that data and records are destroyed or erased from our systems when no longer required. The amount of time that records are kept for varies depending upon the type of Personal data they contain.

## **9. Your Rights – Marketing and Third Party Oil Portal**

You have the right to ask us not to process your Personal data for marketing purposes. Where required by law, we will inform you (before or at the time of collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by ticking certain boxes on the forms we use to collect your data. You can also exercise your right to 'opt-out' from receiving marketing communications at any time by contacting us at [enquiries@trafigura.com](mailto:enquiries@trafigura.com).

The Oil Portal may, from time to time, contain links to and from the websites of our partner networks and affiliates, or of other third parties. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any Personal data to these websites.

## **10. Your Rights - Access, Rectification and Deletion**

Applicable data privacy laws give rights to individuals in respect of Personal data that organisations hold about them. If you wish to:

- Request access to, and a copy of, the Personal data that we hold about you; or
- request that we rectify, delete, or limit or oppose the processing of your personal data,

Please submit your request please contact us at [enquiries@trafigura.com](mailto:enquiries@trafigura.com), including your name and address, a copy of an official identification document, and a clear and precise description of the right you are seeking to exercise, the Personal data with respect to which you wish to exercise such right and other information you consider relevant. We will process your request in accordance with the Law and other applicable regulations.

## **11. Cookies and other tools**

We may use information about your visits to the Oil Portal by using a “cookie” or similar technologies for storing information, e.g. local shared objects and web beacons (“cookies”). A cookie is a small text file which is transferred to and stored on your computer, portable device or mobile. Cookies can be unique to your web browser and contain text and information e.g. unique identifier, site name, digits and numbers.

Cookies are used to differentiate one user from another, to pass information from page to page during their visit to the Oil Portal and to collect data about a given browser, along with the information requested and sent by the browser's operator. They enable us:

- To estimate our audience size and usage pattern;
- To store information about your preferences, and so allow us to customise the Oil Portal according to your individual interests; and
- To recognise you when you return to the Oil Portal.

By using the Oil Portal, you are consenting to our use of cookies.

## 12. What cookies do we use?

We use two types of cookies: session cookies and persistent cookies. Session cookies are temporary files that only remain in the cookie file of your browser until you leave our Oil Portal. Persistent cookies may remain for periods ranging from hours to years after you leave the Oil Portal and after your internet browser is closed.

The cookies we use are ‘analytical’ cookies (in particular, we use google analytics which provides us with meaningful reports on how visitors use the Oil Portal). The cookies we use are first-party cookies, i.e. that they are set by the Oil Portal when you visit and the data collected by these cookies cannot be altered or retrieved by any service on another domain or by any third party.

Our use of cookies basically falls into three categories:

- Those that are strictly necessary to deliver the services and products you have requested
- Cookies related to the performance of the Oil Portal, e.g. google analytics
- Cookies related to the functionality of the Oil Portal, e.g. remembering your preferred language.

The following table lists the principal cookies used on the Oil Portal, their purpose and the time they will be stored on your computer, portable device or mobile:

Cookie	Operation and Purpose	Is this a session or persistent cookie?
__utma	This cookie is typically written to the internet browser on your first visit to our Oil Portal from that internet browser. If the cookie is deleted from by the internet browser operator, and the internet browser subsequently visits our Oil Portal a new __utma cookie is written with a different unique ID. This cookie is used to determine	persistent

	unique visitors to our Oil Portal and is updated with each page view. Additionally, this cookie is provided with a unique ID that Google Analytics uses to ensure the validity and the accessibility of the cookie as an extra security measure.v	
__utmb	This cookie is used to establish and continue a user session with our Oil Portal. Each time a user visits a different page on our Oil Portal, the cookie is updated to expire in 30 minutes, so a single session continues for as long as the user's activity on our Oil Portal continues, within 30 minute intervals. If it does not find the cookie, a new cookie is written and a new session is established.	session
__utmc	This cookie is no longer used by the ga.js tracking code; however, historically, it operated in conjunction with the __utmb cookie to determine whether or not to establish a new user session. For backwards compatibility purposes, this cookie is continuing to be written. It expires when the user exits the browser.	session
__utmz	This cookie stores the type of referral used by a visitor to reach our Oil Portal, for instance by a direct method, by a referring link, via a Oil Portal search or as the result of a campaign such as an advertisement or an email link. This cookie is used to calculate search engine traffic, advertising campaigns and page navigation within our Oil Portal and is updated with each page a user views.	persistent
lang	This cookie is set when a visitor to our Oil Portal changes the language setting. Its purpose is to remember that visitor's language preference between visits to our Oil Portal.	persistent

For further information about google analytics, including in particular the use of \_\_utma, \_\_utmb, \_\_utmc and \_\_utmz cookies, please visit: <https://policies.google.com/technologies/cookies>.

### 13. How can you change your cookie preferences?

You may at any time refuse to accept or block cookies by activating the setting on your internet browser which allows you to refuse the setting of cookies. You may also be able to change the setting on your internet browser so that only particular types of cookies will be accepted.

Please note, if you change your settings in either of these ways, you may be unable to access certain parts of the Oil Portal.

### 14. Changes to Our Privacy Policy

We reserve the right to modify or amend this Privacy Policy at any time. Any changes we may make to this Privacy Policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. It is your responsibility to review this Privacy Policy every time you submit information to us.

## **15. Contact**

Questions, comments and requests regarding this Privacy Policy and Trafigura's handling of your Personal data are welcomed and should be addressed to [enquiries@trafigura.com](mailto:enquiries@trafigura.com), as well as complaints and concerns in the first instance.

If you are not satisfied with the handling of your concern or complaint by Trafigura, you can escalate this to your national Data Protection Authority.