

Privacy Policy

We take your privacy very seriously. Please read this privacy policy carefully as it contains important information on who we are and how and why we collect, store, use and share your personal data. It also explains your rights in relation to your personal data and how to contact us or supervisory authorities in the event you have a complaint.

We collect, use and are responsible for certain personal data about you. When we do so we are subject to the UK General Data Protection Regulation (UK GDPR).

Key terms

It would be helpful to start by explaining some key terms used in this policy:

We, us, our	ORLEN LNG Trading Limited and ORLEN LNG Shipping Limited
Personal data	Any information relating to an identified or identifiable individual

Personal data we collect about you

We may process the following personal data about you depending on whether you are a counterparty, client, potential counterparty or client, service supplier, broker, consultant, contractor, business partner and/or job applicant or in any other way use our services, are communicating with us or enter into agreements, contracts etc. with us:

- your name and contact information, including email address, telephone number, company details and job title
- location data
- information contained which we may receive in connection with inquiries, correspondence or cooperation
- information to enable us to undertake credit, sanctions or other financial checks on companies and associated parties
- your activities on, and use of, our website
- your professional online presence e.g. LinkedIn profile
- information about how you use our website, IT, communication and other systems including IP address, browsing data, language settings, session activity and other website analytics

We collect and use this personal data for the purposes described in the section '**How and why we use your personal data**' below.

How your personal data is collected

We collect most of this personal data directly from you—in person, by telephone, text or email and/or via our website. However, we may also collect information:

- from publicly accessible sources, e.g. Companies House;
- directly from a third party, e.g. sanctions screening providers;
- from a third party with your consent, e.g. via an agent or broker
- from cookies on our website—for more information on our use of cookies, please see Cookie Policy
- via our IT systems, e.g.: communications systems, email and instant messaging systems

How and why we use your personal data

Under data protection law, we can only use your personal data if we have a proper reason, e.g.:

- where you have given consent
- to comply with our legal and regulatory obligations
- for the performance of a contract with you or to take steps at your request before entering into a contract, or
- for our legitimate interests or those of a third party

A legitimate interest is when we have a business or commercial reason to use your personal data, so long as this is not overridden by your own rights and interests. We will carry out an assessment when relying on legitimate interests.

The table below explains what we use your personal data for and why.

<u>What we use your personal data for</u>	<u>Our reasons</u>
Providing services to you	To perform our contract with you or to take steps at your request before entering into a contract
<p>Conducting checks to identify our customers including screening for financial and other sanctions or embargoes and credit reference checks via external credit reference agencies</p> <p>Other activities necessary to comply with professional, legal and regulatory obligations that apply to our business</p>	<p>Depending on the circumstances:</p> <ul style="list-style-type: none"> — to comply with our legal and regulatory obligations — for our legitimate interests — to ensure our customers are likely to be able to pay for our products and/or services
To enforce legal rights or defend or undertake legal proceedings	<p>Depending on the circumstances:</p> <ul style="list-style-type: none"> — to comply with our legal and regulatory obligations; — in other cases, for our legitimate interests, i.e. to protect our business, interests and rights

<u>What we use your personal data for</u>	<u>Our reasons</u>
Ensuring the confidentiality of commercially sensitive information	Depending on the circumstances: — to protect trade secrets and other commercially valuable information — to comply with our legal and regulatory obligations
Protecting the security of systems and data used to provide our products and/or services	To comply with our legal and regulatory obligations We may also use your personal data to ensure the security of systems and data to a standard that goes beyond our legal obligations, and in those cases our reasons are for our legitimate interests to prevent unauthorised access, protect systems and data and to prevent and detect criminal activity that could be damaging for you and/or us
Marketing our services to: — existing and former customers — third parties who have previously expressed an interest in our services or with whom we have had no previous dealings	To promote our business to existing and former customers

Who we share your personal data with

We routinely share personal data with:

- third parties we use to help deliver our services
- other third parties we use to help us run our business, e.g. marketing agencies or website hosts
- credit reference agencies and sanctions screening providers

How long your personal data will be kept

Different retention periods apply for different types of personal data. We will not keep your personal data for longer than we need it for the purpose for which it is used.

Transferring your personal data out of the UK

It is sometimes necessary for us to transfer your personal data to countries outside the UK. In those cases we will comply with applicable UK laws designed to ensure the privacy of your personal data.

ORLEN LNG Trading Limited and ORLEN LNG Shipping Limited are a part of a global organisation and in common with other organisations, we use third parties located in other countries to help us run

our business. As a result, personal data may be transferred outside the countries where we and our customers are located. This includes countries outside the European Economic Area (“EEA”) and to countries that do not have laws that provide specific protection for personal data. We have taken steps to ensure all personal data is provided with adequate protection and that all transfers of personal data outside the EEA are done lawfully. Where we transfer personal data outside of the EEA to a country not determined by the European Commission as providing an adequate level of protection for personal data, the transfers will be under an agreement which covers the requirements for the transfer of personal data outside the EEA.

Your rights

You have the following rights, which you can exercise free of charge:

Access	The right to be provided with a copy of your personal data
Rectification	The right to require us to correct any mistakes in your personal data
Erasure (also known as the right to be forgotten)	The right to require us to delete your personal data—in certain situations
Restriction of processing	The right to require us to restrict processing of your personal data in certain circumstances, e.g. if you contest the accuracy of the data
Data portability	The right to receive the personal data you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party—in certain situations
To object	<p>The right to object:</p> <ul style="list-style-type: none"> — at any time to your personal data being processed for direct marketing (including profiling) — in certain other situations to our continued processing of your personal data, e.g. processing carried out for the purpose of our legitimate interests unless there are compelling legitimate grounds for the processing to continue or the processing is required for the establishment, exercise or defence of legal claims
Not to be subject to automated individual decision making	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you
The right to withdraw consent	If you have provided us with a consent to use your personal data you have a right to withdraw

	<p>that consent easily at any time</p> <p>Withdrawing consent will not affect the lawfulness of our use of your personal data in reliance on that consent before it was withdrawn</p>
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For more information on each of those rights, including the circumstances in which they apply please see the [Guidance from the UK Information Commissioner's Office \(ICO\)](#).

If you would like to exercise any of those rights, please:

- email, call or write to us—see below: **'How to contact us'**, and
- provide enough information to identify yourself and any additional identity information we may reasonably request from you
- let us know what right you want to exercise and the information to which your request relates

Keeping your personal data secure

We have appropriate security measures to prevent personal data from being lost accidentally, or used or accessed unlawfully. We limit access to your personal data to those who have a genuine business need to access it. Those processing your personal data will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

If you want detailed information on how to protect your personal data and other information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit www.getsafeonline.org. Get Safe Online is supported by HM Government and leading businesses.

How to complain

Please contact us if you have any queries or concerns about our use of your personal data (see below **'How to contact us'**). We hope we will be able to resolve any issues you may have.

You may also have the right to lodge a complaint with the Information Commissioner (the UK data protection regulator).

Changes to this privacy policy

This privacy notice was published on 21.05.2025 and last updated on 21.05.2025

We may change this privacy notice from time to time recommend that you revisit it on occasion to see the latest version.

Updating your personal data

We take reasonable steps to ensure your personal data remains accurate and up to date. To help us with this, please let us know if any of the personal data you have provided to us has changed, see below '**How to contact us**'.

How to contact us

If you wish to contact us please write to us at 3rd Floor, 20 Greycoat Place, London, SW1P 1SB, email info@orlenlng.com or call us on 020 4553 9226.

Do you need extra help?

If you would like this notice in another format (for example audio, large print, braille) please contact us (see 'How to contact us' above).