ADNOC GLOBAL TRADING LTD

Privacy Statement for customers, suppliers, counterparts and partners

June 2024

أدنوك للتجارة العالمية
ADNOC Global Trading

Definitions

The terms "AGT," "AGT Group", "the Company," or "the Group" may be used for convenience and refer to ADNOC Global Trading Ltd and its direct and indirect subsidiaries and affiliates, each of which are separate and distinct legal entities. Further, the words "we," "us," "our," and "ourselves" are used to refer generally to the companies of the AGT Group.

Our Group

AGT consists of several entities which our counterparties, customers, suppliers, partners and their representatives may engage with and which may be involved with the collection and/or processing of personal data. These entities include:

- ADNOC Global Trading Ltd; and
- ADNOC Global Trading Asia Pte. Ltd.

Our full contact addresses and company registrations are included at the end of this notice.

Who is responsible for processing your personal data?

The AGT entity, or entities, to which you or the business you represent or are associated with, provided your personal data will be a "Controller" of your personal data. The exact entity, or entities, will depend on the products traded and location these products are serviced from, and you will be made aware of this in the associated contractual agreements you sign when becoming our customer.

Data Protection Officer

AGT have appointed a Data Protection Officer to safeguard and manage our use of personal data. They may be contacted electronically at the following email address: dataprotectionoffice.agt@adnoc.ae, or in writing at the addresses at the end of this notice.

Types of Personal Data that We Collect About You and Why

We collect and process personal data from, and in relation to, potential, existing, and previous counterparties, customers, suppliers, partners and their representatives in the following categories:

- **Records connected with our relationship or interaction with you (including former relationships and interactions):** this may include notes and records of agreements, interactions, meetings, conversations and correspondence with us including recordings of telephone calls and electronic messages.
- **Business contact and other information:** such as job title, department, company name.
- **Private contact and identification information:** Such as name, personal postal address, personal e-mail address, personal phone number, personal electronic messenger information, ID documentation, date and place of birth, nationality (if necessary).

We process personal data covered by this Privacy Notice for the following purposes:

- **Business execution:** including developing products and services with, or for, our counterparties, customers, suppliers, partners and their representatives. Concluding and executing related agreements, legal contracts, and supporting documentation as required.
- **Managing our ongoing relationships:** such as maintaining and promoting contact with existing counterparties, customers, suppliers, partners and their representatives, to ensure we continue to service these relationships effectively.

- **Meeting our own Legal, Regulatory and Compliance obligations:** which may include a number or combination of the following areas:

  (a) Performing Know Your Customer, anti-money laundering, and other due diligence checks at the beginning of an engagement and on an ongoing basis.

  (b) Performing prudential and regulatory compliance checks at the beginning of an engagement and on an ongoing basis.

  (c) Performing account and transaction monitoring, transaction reporting, tax reporting and investigating and preventing fraud and other crime.

  (d) Making disclosures to, and complying with requests from, regulators, tax authorities, governmental and public authorities and law enforcement agencies.

  (e) To the extent permitted or required by law, recording and monitoring telephone conversations, emails and electronic messenger communications in accordance with the above.

The basis under which these data are collected are:

- In order to enter into a contract at your request;
- Where it is necessary to comply with a legal or regulatory obligation;
- Where it is necessary for the purposes of our legitimate interests (subject to applicable local law which provides otherwise); or
- With your explicit consent.

This information may be processed manually and/or with the support of computerized means. In certain situations, such as anti-money laundering screening, this may also involve the use of information legitimately gathered from open sources accessible to the public such as government issued sanctions lists and media sources. If we have collected your data on the basis of your consent, you have the right to withdraw this consent; further information on your rights is included later in this notice.

Sharing and Transfer of Personal Data

As a global business we may need to transfer personal data between our different offices and locations to ensure we can service our counterparties, customers, suppliers, and partners effectively. We may also need to use authorised third-party companies or other parties to support the delivery of our business.

When we transfer personal data between companies within the AGT Group and/or to authorised third parties outside of our group, we take organisational, contractual and legal measures to ensure that your personal data is processed exclusively for the purposes mentioned above and that adequate levels of protection have been implemented in order to safeguard your personal data.

Retention Period

Personal Data processed for the purposes described above will be stored in compliance with the principles of proportionality and necessity. We will store such data for varying time periods in order to maintain contractual relationships, to assist us in complying with legal and regulatory obligations, and, where required, to enable us to establish, exercise and defend legal rights and claims or for other legitimate business reasons. In general, this will mean that your personal data will be deleted after seven years from the cessation of a business relationship with us unless we are required to perform an alternative treatment.

Data subject rights

You should know that you have a number of legal rights concerning how we use your personal data, these include the right to:

- Access and request a copy of the personal data we hold about you;
- Request rectification of any inaccurate data which we hold about you;
- Object to our processing of your personal data;
- Request the erasure and/or deletion of data which we hold about you;
- Obtain a restriction on how we process your data;
- Make a complaint to the relevant personal data protection authority; and
- If you provided your consent to us for processing your data, to remove this consent and request we stop processing your data.

For more information about your rights, or to exercise your rights, please contact our Data Protection Officer. Please note that in responding to such requests, and to ensure we maintain your and other individuals' information securely, we may require you to validate your identity.

Updates to this Notice

This notice may be updated from time to time. Such updates may reflect the types of personal data we collect, the purposes we use it for, and the ways in which it is shared. If you would like to confirm the latest version of this Privacy Notice please visit https://www.adnoc.ae/en/adnoc-global-trading/legal/personal-disclosures.

Full contact addresses and company registrations:

- **ADNOC GLOBAL TRADING LTD** a company existing under the laws of Abu Dhabi Global Market with registration number 000002786 and whose registered office is at Level 25, Al Sarab Tower (Tower 2), ADGM Square, Al Maryah Island, P.O. Box 764649, Abu Dhabi, UAE
- **ADNOC GLOBAL TRADING ASIA PTE. LTD.** a company existing under the laws of the Republic of Singapore with company registration number 202124323R