

# **PUMA WEBSITE AND EPUMA APP PRIVACY POLICY**

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## **INTRODUCTION**

Welcome to the privacy policy of Puma Energy International SA (“**Puma**”), incorporated in Switzerland and whose registered office is at 1 Rue de Jargonnant, 1207 Geneva, Switzerland.

Puma respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

This privacy policy is provided in a layered format so you can click through to the specific areas set out below. Alternatively, you can download a pdf version of the policy here. Please also use the Glossary towards the end of this privacy policy to understand the meaning of some of the terms used in this privacy policy.

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## **1. IMPORTANT INFORMATION AND WHO WE ARE**

**Purpose of this privacy policy**

This privacy policy aims to give you information on how Puma collects and processes your personal data through your use of this website and, if applicable, through your use of the ePuma Portal and ePuma Portal Mobile Application (the “**App**”), including any data you may provide when you visit this website or when you purchase a product or service through the App.

This website and the App are not intended for children and we do not knowingly collect data relating to children.

### **Controller**

Puma is part of a group which is formed of different legal entities (the “**Puma Group**”). This privacy policy is issued on behalf of the Puma Group so when we mention “Puma”, “we”, “us” or “our” in this privacy policy, we are referring to the relevant company in the Puma Group responsible for processing your data. Puma is the controller and is responsible for this website and the App.

We have appointed certain persons who are responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights in connection with our use of your data, please get in contact using the details set out below.

### **Contact details**

Full name of legal entity: Puma Energy International SA

Email address: [enquiries@pumaenergy.com](mailto:enquiries@pumaenergy.com)

Postal address: 1 Rue de Jargonnant, 1207 Geneva, Switzerland

### **Changes to this privacy policy and your duty to inform us of changes**

We reserve the right to update, modify or amend this privacy policy at any time. Any changes we make will be posted on this page and, where appropriate (or possible), notified to you by email.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during the course of your relationship with us.

### **Third-party links**

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control any such third-party websites, plug-ins and applications and we are not responsible for their privacy statements or associated policies. When you leave our website via any such links, we strongly encourage you to read the privacy policy (and any associated policies) of every website you visit.

## **2. THE DATA WE COLLECT ABOUT YOU**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have classified as follows:

- **“Identity Data”** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **“Contact Data”** includes billing address, delivery address, email address and telephone numbers.
- **“Financial Data”** includes bank account and payment card details.
- **“Transaction Data”** includes details about payments to and from you and other details of products and services you have purchased from us.
- **“Technical Data”** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
- **“Profile Data”** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **“Usage Data”** includes information about how you use our website, products and services.
- **“Marketing and Communications Data”** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **“Aggregated Data”** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We do not collect any **“Special Categories of Personal Data”** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

#### **If you fail to provide personal data**

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

### **3. HOW IS YOUR PERSONAL DATA COLLECTED?**

We use different methods to collect data from and about you including those items listed below.

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes

personal data you provide when you:

- apply for our products or services (including via the App);
  - request marketing to be sent to you;
  - enter a promotion or survey; or
  - give us feedback or contact us.
- Automated technologies or interactions. As you interact with our website, we will automatically collect “**Technical Data**” about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy below for further details.

#### 4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.

See the table below to find out more about the types of lawful basis that we will rely on to process your personal data.

Generally, we do not rely on consent as a lawful basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

#### Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the lawful bases we rely on to do so. We have also identified what our legitimate interests are where appropriate. Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a customer	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver your	(a) Identity	(a) Performance of a contract with you

<p>order including:</p> <p>(a) Manage payments, fees and charges</p> <p>(b) Collect and recover money owed to us</p>	<p>(b) Contact</p> <p>(c) Financial</p> <p>(d) Transaction</p> <p>(e) Marketing and Communications</p>	<p>(b) Necessary for our legitimate interests (to recover debts due to us)</p>
<p>To manage our relationship with you which will include:</p> <p>(a) Notifying you about changes to our terms or privacy policy</p> <p>(b) Asking you to leave a review or take a survey</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Marketing and Communications</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary to comply with a legal obligation</p> <p>(c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)</p>
<p>To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Technical</p>	<p>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)</p> <p>(b) Necessary to comply with a legal obligation</p>
<p>To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Usage</p> <p>(e) Marketing and Communications</p> <p>(f) Technical</p>	<p>Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)</p>
<p>To use data analytics to improve our website, products/services, marketing, customer relationships and experiences</p>	<p>(a) Technical</p> <p>(b) Usage</p>	<p>Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to</p>

		develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	Necessary for our legitimate interests (to develop our products/services and grow our business)

### Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us and you have not opted out of receiving that marketing.

### Third-party marketing

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

### Opting out

You can ask us or third parties to stop sending you marketing messages by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product or service purchase.

### Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our cookie policy below.

### Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the lawful basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **5. DISCLOSURES OF YOUR PERSONAL DATA**

We may share your personal data with the parties set out below for the purposes set out in the table (*Purposes for which we will use your personal data*) above.

- Internal Third Parties as defined in the Glossary.
- External Third Parties as defined in the Glossary.
- Third parties, to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## **6. INTERNATIONAL TRANSFERS**

We share your personal data within the Puma Group. This may involve transferring your data outside the European Economic Area (EEA).

Many of our external third parties are based outside the EEA so their processing of your personal data will involve a transfer of data outside the EEA.

By submitting your data to us, you agree to the potential transfer of your data to a country other than your own.

## **7. DATA SECURITY**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

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

## **8. DATA RETENTION**

## **How long will you use my personal data for?**

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

In some circumstances you can ask us to delete your data: see your legal rights below for further information.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

## **9. YOUR LEGAL RIGHTS**

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

- **Request access** to your personal data.
- **Request correction** of your personal data.
- **Request erasure** of your personal data.
- **Object to processing** of your personal data.
- **Request restriction of processing** your personal data.
- **Request transfer** of your personal data.
- **Right to withdraw** consent.

If you wish to exercise any of the rights set out above, please contact us.

### **No fee usually required**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up

our response.

### **Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## **10. COOKIES**

### **Cookies and other tools**

We may use information about your visits to our website 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 our website 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 our website according to your individual interests; and
- to recognise you when you return to our website.

By using our website, you are consenting to our use of cookies.

### **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 website. Persistent cookies may remain for periods ranging from hours to years after you leave our website 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 our website). The cookies we use are first-party cookies, i.e. that they are set by our website 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 our websites, e.g. Google Analytics; and
- cookies related to the functionality of our websites, e.g. remembering your preferred language.

The following table lists the principal cookies used on our website, 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 website from that internet browser. If the cookie is deleted from by the internet browser operator, and the internet browser subsequently visits our website a new __utma cookie is written with a different unique ID. This cookie is used to determine unique visitors to our website 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.	persistent
__utmb	This cookie is used to establish and continue a user session with our website. Each time a user visits a different page on our website, the cookie is updated to expire in 30 minutes, so a single session continues for as long as the user's activity on our website 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 website, for instance by a direct method, by a referring link, via a website 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 website and is updated with each page a user views.	persistent
lang	This cookie is set when a visitor to our website changes the language setting. Its purpose is to remember that visitor's language preference between visits to our website.	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>.

#### **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 our website.

## **11. GLOSSARY**

### **Lawful basis**

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal obligation means processing your personal data where it is necessary for compliance with a legal obligation to which we are subject.

### **Third parties**

#### Internal third parties

This category includes other companies in the Puma Group acting as joint controllers or processors who require the data for business or legal reasons. This could include internal third parties who provide IT, system administration and other services.

#### External third parties

External third parties may include:

- Service providers acting as processors or joint controllers who provide IT and system administration services.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- Regulators and other authorities acting as processors or joint controllers who require reporting of processing activities in certain circumstances.

We may also disclose your data to third parties:

- In the event that we sell, merge or buy any business or assets, in which case we may disclose your data to the prospective seller or buyer of such business or assets.
- If Puma or substantially all of its assets are acquired by a third party, in which case data held by it about its customers will be transferred.

## Your legal rights

You have the right to:

- **Request access** to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:
  - if you want us to establish the data’s accuracy;
  - where our use of the data is unlawful but you do not want us to erase it;
  - where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
  - you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent** at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.