

DATA PRIVACY POLICY

PENINSULA PETROLEUM SUPPLIERS AND CUSTOMERS

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INTRODUCTION

From 25 May 2018, the European Union ('EU') General Data Protection Regulation ('GDPR') will be in force. The GDPR is designed to protect European citizen's fundamental rights in relation to the "processing" of their personal data. "Processing" data means any operations performed on personal data such as collecting, recording, storing, adapting or otherwise making the data available.

Under the GDPR, European citizens have a right to be informed about the ways their personal data is processed, with whom it is shared, and what actions they can take in relation to it.

This Data Privacy Policy is part of the Peninsula Group's ('Peninsula') measures to comply with the GDPR. It is meant to provide you, our supplier or customer contacts, with the information you need to understand your rights under the GDPR, what personal data is being processed by Peninsula and what duties Peninsula has in this regard.

WHO ARE WE?

Peninsula is a group of companies incorporated in various countries around the world who is engaged in the business of marine fuels and lubricants supply.

Peninsula is both a 'Data Controller' and a 'Data Processor' under the GDPR. For definitions of these terms, as well as how 'personal data' is defined under the GDPR, please refer to the glossary annexed to this policy.

WHAT PERSONAL DATA WILL PENINSULA COLLECT FROM YOU?

Peninsula will only collect personal data from you which it needs in order to carry out its ordinary course of commercial activity.

Peninsula employees may have the following personal data on you:

- Name
- Email address(es)
- Phone number(s)
- Country of residence

This personal data will be held exclusively on our internal system and will therefore only be accessible to Peninsula employees.

HOW WILL PENINSULA USE THIS PERSONAL DATA?

Your personal data is currently stored by Peninsula on its servers in the UK.

Peninsula will use this personal data to carry out its business activities with customers and suppliers (predominantly selling or buying petroleum products and lubricants).

WHO WILL PENINSULA SHARE THIS PERSONAL DATA WITH?

Peninsula will only share this personal data among its employees.

HOW LONG WILL PENINSULA KEEP THIS PERSONAL DATA FOR?

Your personal data will be kept on Peninsula's system for the period of time that you and/or your employer has a business relationship with Peninsula.

Your personal data will be deleted if we learn that you have left your employer, your employer ceases to be a supplier and/or customer of ours, or if your employer ceases to exist altogether. If none of these options applies and this personal data has been on our system for over 24 months without being used, it will be deleted.

WHAT RIGHTS DO YOU HAVE?

You have the following rights under the GDPR regarding your personal data:

- that it will be processed lawfully, fairly and in a transparent manner by Peninsula.
- that it will be collected for a specific purpose, which means that Peninsula:
 - will only collect your personal data for specified, explicit, and legitimate purposes; and
 - will not process your personal data in an incompatible manner with those purposes, except under limited circumstances.
- that it will be kept minimal, which means that Peninsula will ensure that your personal data is:
 - adequate;
 - relevant; and
 - limited to what is necessary for the purposes of processing.
- that it is accurate, which means that Peninsula will ensure that your personal data is:
 - correct and kept up to date; and
 - amended or deleted without delay when inaccurate.
- that it is easily accessible, which means that Peninsula will be able to provide you with details of the personal data they hold on you in a Word document or by e-mail;
- that it is kept integral and confidential, which means that Peninsula keeps your personal data secure through appropriate technical and organisational measures against unauthorised or unlawful processing and against accidental loss, destruction or damage.

Peninsula's IT Department, located in London and India, is putting in place measures to ensure the personal data detailed above is protected on their servers. If any personal data were to unfortunately be hacked, Peninsula's IT Department is also currently working towards having the personal data encrypted so that any leak would be unusable by the hacker. If the encryption fails and if the personal data stolen is significant, Peninsula will advise you as soon as possible if your personal data is at risk.

WHO CAN YOU SPEAK TO IF YOU HAVE ANY CONCERNS?

If you have any concerns about how Peninsula is using your information then initially you should contact the Peninsula GDPR Team at gdpr@peninsulapetroleum.com and if your complaint remains unresolved then you can contact the Information Commissioner's Office, details available at www.ico.org.uk.

ANNEX GLOSSARY

DATA CONTROLLER

Means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data. Where the purposes and means of such processing are determined by EU or Member State law, the controller or the specific criteria for its nomination may be provided for by EU or Member State law.

DATA PROCESSOR

Means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

PERSONAL DATA

Means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

PROCESSING

Means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.