

Personal Data Processing Policy

1. General Provisions

This Personal Data Processing Policy (hereinafter referred to as the “Policy”) is drafted in accordance with the requirements of Federal Law No. 152-FZ “On Personal Data” dated July 27, 2006 (hereinafter referred to as the “Personal Data Law”) and defines the procedure for processing personal data and measures to ensure the security of personal data undertaken by **T ENERGY & TRADING DMCC** (hereinafter referred to as the “Operator”).

1.1. The Operator’s foremost goal and essential condition for conducting its activities is the observance of human and civil rights and freedoms when processing their personal data, including the protection of the right to privacy, personal and family confidentiality.

1.2. This Policy of the Operator regarding the processing of personal data (hereinafter referred to as the “Policy”) applies to all information that the Operator may obtain about visitors to the website <https://t-energy.com>.

2. Key Terms Used in the Policy

2.1. **Automated Processing of Personal Data** — processing of personal data using computer technology.

2.2. **Blocking of Personal Data** — temporary suspension of personal data processing (except where processing is necessary to clarify personal data).

2.3. **Website** — a collection of graphical and informational materials, as well as computer programs and databases, ensuring their availability on the internet at the network address <https://t-energy.com>.

2.4. **Personal Data Information System** — a set of personal data contained in databases and information technologies and technical means ensuring their processing.

2.5. **De-identification of Personal Data** — actions that make it impossible to determine the ownership of personal data to a specific User or other personal data subject without additional information.

2.6. **Processing of Personal Data** — any action (operation) or set of actions (operations) performed with personal data, with or without automation tools, including collection, recording, systematization, accumulation, storage, clarification (updating, modification), retrieval, use, transfer (distribution, provision, access), de-identification, blocking, deletion, or destruction of personal data.

2.7. **Operator** — a state body, municipal authority, legal entity, or individual that independently or jointly organizes and/or processes personal data, as well as determines the purposes of processing, the composition of personal data to be processed, and the actions (operations) performed with personal data.

2.8. **Personal Data** — any information directly or indirectly related to an identified or identifiable User of the website <https://t-energy.com>.

2.9. **Personal Data Authorized for Dissemination** — personal data to which access by an unlimited number of persons is granted by the personal data subject through consent to the processing of personal data permitted for dissemination under the Personal Data Law.

2.10. **User** — any visitor to the website <https://t-energy.com>.

2.11. **Provision of Personal Data** — actions aimed at disclosing personal data to a specific person or group of persons.

2.12. **Dissemination of Personal Data** — any actions aimed at disclosing personal data to an indefinite group of persons (transfer of personal data) or making personal data available to an unlimited audience, including publication in media, placement in information and telecommunication networks, or providing access in any other way.

2.13. **Cross-Border Transfer of Personal Data** — transfer of personal data to the territory of a foreign state to a foreign authority, foreign individual, or foreign legal entity.

2.14. **Destruction of Personal Data** — any actions resulting in the irreversible destruction of personal data, making it impossible to restore the content of personal data in the information system and/or destroying physical media containing personal data.

3. Key Rights and Obligations of the Operator

3.1. The Operator has the right to:

- Receive accurate information and/or documents containing personal data from the personal data subject;
- Continue processing personal data without the subject's consent if grounds specified in the Personal Data Law exist, including after the subject withdraws consent or requests termination of processing;
- Independently determine the necessary measures to comply with obligations under the Personal Data Law and related regulations, unless otherwise specified by law.

3.2. The Operator is obligated to:

- Provide the personal data subject, upon request, with information regarding the processing of their personal data;
- Organize processing in accordance with Russian law;
- Respond to requests from personal data subjects and their legal representatives in accordance with the Personal Data Law;
- Disclose necessary information to the authorized body for personal data protection within 10 days of receiving a request;
- Publish or otherwise ensure unrestricted access to this Policy;
- Implement legal, organizational, and technical measures to protect personal data from unauthorized access, destruction, alteration, blocking, copying, dissemination, or other unlawful actions;
- Cease processing and destroy personal data under conditions stipulated by the Personal Data Law;
- Fulfill other obligations under the Personal Data Law.

4. Key Rights and Obligations of Personal Data Subjects

4.1. Personal Data Subjects have the right to:

- Obtain information about the processing of their personal data, except as restricted by law;
- Demand the Operator to clarify, block, or destroy their data if it is incomplete, outdated,

inaccurate, illegally obtained, or unnecessary for processing purposes;

- Impose a requirement for prior consent when processing data for marketing purposes;
- Withdraw consent or request termination of processing;
- Appeal unlawful actions or inaction of the Operator to the authorized body or court;
- Exercise other rights under Russian law.

4.2. Personal Data Subjects are obligated to:

- Provide accurate information about themselves to the Operator;
- Notify the Operator of updates or changes to their personal data.

4.3. Persons providing false information about themselves or others without consent bear liability under Russian law.

5. Principles of Personal Data Processing

5.1. Processing is conducted lawfully and fairly.

5.2. Processing is limited to specific, predefined, and legitimate purposes.

5.3. Merging databases for incompatible purposes is prohibited.

5.4. Only data relevant to the processing purposes is processed.

5.5. The content and scope of processed data align with stated purposes; excess data is prohibited.

5.6. Accuracy, sufficiency, and relevance of data are ensured; incomplete or inaccurate data is corrected or deleted.

5.7. Storage duration does not exceed processing purposes unless otherwise required by law or agreement.

6. Purposes of Personal Data Processing

Purpose: Informing the User via email communications.

Personal Data: Full name, email address, phone numbers.

Legal Basis: Federal Law No. 149-FZ “On Information, Information Technologies, and Data Protection” dated July 27, 2006.

Processing Types: Transfer of personal data.

7. Conditions for Processing Personal Data

7.1. Processing occurs with the subject’s consent.

7.2. Processing is necessary for fulfilling international treaties, legal obligations, justice administration, contract execution, or legitimate interests of the Operator/third parties.

7.3. Processing of publicly available or legally mandated data is permitted.

8. Procedure for Collection, Storage, Transfer, and Other Processing Activities

8.1. The Operator ensures data security through legal, organizational, and technical measures.

8.2. Personal data is not transferred to third parties without consent, except as required by law.

8.3. Users may update their data by emailing info@t-energy.com with “Update Personal Data” in the subject line.

8.4. Processing ceases upon achieving its purposes, unless extended by law or agreement.

Consent may be withdrawn via email to info@t-energy.com with “Withdrawal of Consent to Process Personal Data”.

8.5. Third-party services (e.g., payment systems) process data under their own policies; the Operator is not liable for their actions.

8.6. Restrictions on processing publicly disseminated data do not apply to state or public interests.

8.7. Confidentiality of personal data is maintained.

8.8. Storage duration complies with processing purposes unless otherwise required.

8.9. Processing ceases upon achieving purposes, consent expiration/withdrawal, or unlawful processing detection.

9. Actions Performed by the Operator with Personal Data

The Operator collects, records, systematizes, stores, updates, retrieves, uses, transfers, de-identifies, blocks, deletes, and destroys personal data. Automated processing and information transfer via networks may occur.

10. Cross-Border Transfer of Personal Data

10.1. The Operator must notify the authorized body before initiating cross-border transfers.

10.2. Prior to notification, the Operator must obtain relevant information from foreign recipients.

11. Confidentiality of Personal Data

The Operator and authorized persons must not disclose or disseminate personal data without consent, except as required by law.

12. Final Provisions

12.1. Users may contact the Operator at info@t-energy.com for clarifications.

12.2. This Policy may be updated; the current version is available at <https://t-energy.com/>.

12.3. The Policy remains effective until replaced by a new version.

Current Version Published at: <https://t-energy.com/>